

FACT SHEET

FACT SHEET

FOR THE DRAFT HAZARDOUS WASTE POST-CLOSURE/HSWA PERMIT RENEWAL PREPARED FOR

**PPG Industries, Inc.
Lake Charles Complex**

**EPA ID# LAD 008086506
Agency Interest # 1255
1300 PPG Drive
Westlake, Louisiana
Calcasieu Parish
70669**

**Permit Number LAD 008086506-PC/HSWA-RN-1
PER20070003**

I. INTRODUCTION

This fact sheet has been developed in accordance with the Louisiana Administrative Code (LAC) 33:V.703.D and briefly sets forth principal and significant facts, legal, methodological and policy requirements of the proposed draft hazardous waste post-closure permit for PPG Industries, Inc., Lake Charles Complex, 1300 PPG Drive, Westlake, Louisiana, Calcasieu Parish, 70669.

The Louisiana Department of Environmental Quality (LDEQ) has prepared this proposed draft hazardous waste permit which addresses the requirements of LAC Title 33, Part V, Subpart 1 and the Federal Resource Conservation and Recovery Act (RCRA) as amended by the 1984 Hazardous and Solid Waste Amendments (HSWA).

PPG Industries is seeking a hazardous waste permit for the post-closure care of the closed Waste Water Treatment Facility and to govern corrective action at the PPG Industries Lake Charles Complex per LAC 33:V.3322.

II. THE PERMITTING PROCESS

The purpose of this fact sheet is to initiate the permitting decision process. The LDEQ, Office of Environmental Services, Waste Permits Division is required to prepare this draft hazardous waste permit. The draft hazardous waste permit sets forth all the applicable conditions that the permittee is required to comply with during the life of the permit. PPG Industries submitted its Hazardous Waste Part B Permit Renewal Application, dated February 7, 2007, to comply with the Environmental Protection Agency (EPA) regulations requiring the ten year permit renewal for facilities that are permitted to treat, store or dispose of hazardous waste under Subtitle C of the Resource Conservation and Recovery Act (RCRA).

The permitting process will afford the LDEQ, interested citizens, and other agencies the opportunity to evaluate the ability of the permittee to comply with the requirements of the LAC 33:V. Subpart 1, and the Hazardous and Solid Waste Amendments (HSWA) portion.

The public is given a minimum of forty-five (45) days to review and comment on the draft permit. The administrative authority, prior to making a decision or taking any final action on the draft permit, will consider all significant comments. The decision of the administrative authority shall be to issue, deny, modify, or revoke the draft permit in accordance with LAC 33:V.705.

A. DRAFT HAZARDOUS WASTE RENEWAL PERMIT

The Waste Permits Division reviewed the permit application and other pertinent technical information, and prepared a draft permit that contains the language that pertains to the operation of the listed facilities.

This draft hazardous waste permit is a tentative determination and is not the final decision of the administrative authority.

B. PUBLIC COMMENT PERIOD

LAC 33:V.715 requires that the public be given at least forty-five (45) days to comment on a draft permit decision.

The specific dates for the opening and closing of the public comment period are contained in the public notice that was issued for this particular permitting action. Any person interested in commenting on the draft post-closure permit for the PPG Industries Lake Charles Complex must do so within the allotted forty-five (45) day comment period.

A public hearing for the draft permit will be held on the date, and at the location and time provided in the public notice (see the notice in the Public Participation Section of the Draft Permit). LDEQ will hold the hearing at least forty-five (45) days after the date on which the public notice is given.

Public notice of the proposed permitting action and of the hearing shall be published in specified newspapers, announced on the designated radio station, and mailed to those persons contained on the facility's mailing list.

C. LOCATIONS OF AVAILABLE INFORMATION

The administrative record, including all supporting documents, is on file at the LDEQ Public Records Center, Room 1-127, 602 North 5th Street, Baton Rouge, Louisiana. These documents may be inspected and copied (at \$0.25 per copy page) at any time

between the hours of 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays).

In addition, a copy of the draft permit, fact sheet, and supporting documents are available for review at the Calcasieu Parish Library, Westlake Branch, 937 Mulberry St., Westlake, Louisiana, 70669-4501 and the Sulphur Regional Branch, 1160 Cypress St., Sulphur, LA 70663-5111.

D. WRITTEN COMMENT SUBMISSION

Interested persons may submit written comments on the draft permit to the administrative authority, at the address listed below, by the closing date of the comment period. All comments should include:

1. the name and address of the commenter,
2. a concise statement of the exact basis for any comment and supporting relevant facts upon which the comment is based,
3. identification of the facility commented on (the EPA Identification Number and AI number), and
4. supporting relevant facts upon which the comments are based.

All comments, further requests for information (including copies of this decision and fact sheet) and any requests by public interest groups or individuals who would like to be included in the mailing list, should be made in writing to

Ms. Soumaya Ghosn
Louisiana Department of Environmental Quality
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313
(225) 219-3276 or fax (225) 219-3309

Any technical questions regarding this draft permit should be addressed to:

Mr. Willard F. Steele
Louisiana Department of Environmental Quality
Office of Environmental Services
Waste Permits Division
Post Office Box 4313
Baton Rouge, LA 70821-4313
(225) 219-3134 or fax (225) 219-3050

III. DESCRIPTION OF OVERALL SITE

The area comprising the current facility held a magnesium plant owned and operated by the U.S. government for the war effort during World War II. Prior to 1940, the area was used for various activities including shipbuilding, petroleum production and lumber activities. PPG Industries first built a chlorine production plant after leasing property from the U.S. government in 1947. The PPG Industries Lake Charles Complex was purchased from the federal government by PPG Industries in 1959.

Currently, the plant employs approximately 1200 workers and is located on approximately 700 acres of land. The operating portions of the plant cover approximately 450 acres. The Lake Charles Complex is located in an industrial area adjacent to the Calcasieu River Estuary. The plant operates twenty-four hours a day and seven days a week. The Lake Charles Complex is an organic chemical, inorganic chemical, and silica production plant.

The Lake Charles Complex is divided into three major production areas or units: Chlor/Alkali, Derivatives, and Silica Products Units. The **Chlor/Alkali Units** produce chlorine, caustic, and hydrogen from the electrolysis of brine. The **Derivatives Unit** produces chlorinated hydrocarbons and muriatic acid. The chlorinated hydrocarbons include vinyl chloride, ethylene dichloride, trichloroethylene, and other chlorinated organics. The **Silica Products Unit** produces sodium silicate from the heat treatment of sand with caustic. Other areas of the plant for purposes of the management of corrective action include the **South Terminal** and the **North Dock**. The **South Terminal** and the **North Dock** were areas where products were stored and loaded onto ships or barges.

IV. HAZARDOUS WASTE FACILITIES

This draft permit addresses one hazardous waste post-closure unit and site-wide corrective action in accordance with the state and federal RCRA regulations. A separate, final hazardous waste operating permit was issued and public noticed separately to address the active management of hazardous waste at certain combustion units, tanks, storage areas at the PPG Industries Lake Charles Complex. The separate, final hazardous waste operating permit was issued on December 16, 2008.

The only hazardous waste management unit addressed in this draft permit is the former Wastewater Treatment Unit that is in post-closure care as detailed by the administratively continued permit issued June 4, 1997. The Wastewater Treatment Unit was part of the wastewater treatment system permitted under the National Pollution Discharge Elimination System (NPDES) for the collection of wastewater and surface run-off from the chlorinated hydrocarbon manufacturing units. Closure activities for the Wastewater Treatment Unit began in July, 1987, because the Wastewater Treatment Unit did not meet certain minimum technology requirements. During the closure of the Wastewater Treatment Unit all waste

material was removed from the unit; however, because of remaining subsurface contamination, PPG Industries was required to obtain a post-closure permit for the Wastewater Treatment Unit.

The EPA issued Section X of the Hazardous Waste RCRA Permit to PPG Industries for the Lake Charles Complex on June 5, 1990. At the time, Section X referred to the HSWA section of the permit. The HSWA Permit contained two major requirements: the performance of a RCRA Facility Investigation and the performance of a Corrective Measures Study to plan corrective measure options to the extent necessary. Investigatory requirements of the HSWA permit were developed and performed under the Risk Evaluation/Corrective Action Program (RECAP, LAC 33:I.Ch.13). RECAP is the risk evaluation tool developed and utilized by the LDEQ.

This draft permit will move the corrective action of the Wastewater Treatment Unit from the requirements for permitted units (the majority of LAC 33:V.Chapter 33) to the requirements for site-wide corrective action under LAC 33:V.3322. The groundwater contamination associated with the Wastewater Treatment Unit is commingled with groundwater contamination from other areas of the facility. Thus, under LAC 33:V.3301.G.1, the management of the groundwater contamination at the Wastewater Treatment Unit may be integrated with the management of corrective action issues for the entire PPG Industries Lake Charles Complex under LAC 33:V.3322. Per LAC 33:V.3301.G., LDEQ has determined that a site-wide approach to groundwater remediation per the requirements of this permit is protective of human health and the environment.

In conjunction with the submittal of the permit renewal application, PPG Industries submitted the Integrated Final Corrective Measures Study Report (IFCMS) to LDEQ. The purpose of the report was to summarize the investigations and ongoing interim measures at the PPG Industries Lake Charles Complex; in addition, the report detailed the proposed final remedies at the Lake Charles Complex. The Integrated Final CMS addressed all site-wide corrective action concerns including the contamination resulting from the Wastewater Treatment Unit. Requirements or remedies that are not already implemented at the time of issuance of this permit will be specified in a schedule of compliance as required by LAC 33:V.3322.B.

In addition to remediation of on-site contamination, PPG Industries has obligations to address any off-site contamination of hazardous waste constituents. However, this permit action will not address the off-site contamination area associated with the PPG Industries Lake Charles Complex because it is being addressed under other legal authority. EPA conducted its own investigation of contamination in the Calcasieu area including an off-site area associated with the Lake Charles Complex called the Off-Site Investigation Area. Subsequently, LDEQ and PPG Industries entered into a cooperative agreement, along with other parties, for remediation associated with portions of the Off-Site Investigation Area. LDEQ and PPG Industries have agreed through an amended settlement agreement (In the Matter of PPG Industries, Inc., Docket No. WC-89-058, December 2003) that the HSWA

corrective action obligations for the Off-Site Investigation Area will be satisfied in the permit to the extent that PPG Industries complies with the Cooperative Agreement.

V. FINANCIAL AND LIABILITY REQUIREMENTS

Financial assurance is required for post-closure care and corrective action remedies as detailed in LAC 33:V.3322. PPG Industries currently meets the post-closure financial assurance requirements by supplying a letter of credit in accordance with LAC 33:V.3711. Financial assurance is required for corrective action once the final remedy has been selected by the permittee and the administrative authority. PPG Industries has submitted a cost estimate for the final remedies that have been proposed in the draft permit. PPG Industries will be required to submit financial assurance for the cost estimates associated with the chosen final remedies for corrective action. While LAC 33:V.3322.B requires the submission of financial assurance to address corrective action, the specific requirements of LAC 33:V.Chapter 37 do not apply. The final financial assurance mechanism must be approved by LDEQ.

VI. IT QUESTIONS SUMMARY OF ANALYSIS

An environmental assessment is not required for remediation/corrective action per La. R.S. 30:2018, because the corrective action process under RECAP and HSWA is the functional equivalent, or more protective. However, in accordance with the requirements set forth by the Louisiana Supreme Court in *Save Ourselves v. Louisiana Environmental Control Commission*, 452 So. 2d 1152 (La. 1983), the LDEQ has considered certain factors in its draft decision on this renewal post-closure permit and has chosen to outline those below.

A. The potential and real adverse environmental effects of the proposed project have been avoided to the maximum extent possible.

PPG Industries has been conducting corrective action per its current HSWA permit since 1990, including numerous interim measures approved by LDEQ. PPG Industries submitted a Part B Permit Renewal Application for the existing Wastewater Treatment Unit and site-wide corrective action at the PPG Industries Lake Charles Complex. PPG Industries also was issued a hazardous waste operating permit renewal for the operation of the hazardous waste management units at the Lake Charles Complex. The operating permit was effective January 30, 2009. The Draft Hazardous Waste Post-Closure/HSWA Permit is not a permit that will allow PPG Industries to manage currently generated hazardous waste; rather, this proposed draft permit addresses remediation/corrective action by formalizing the final remedy selections that were arrived at under the previous RCRA/HSWA permit. The permit is necessary to prevent off site release of hazardous constituents and provide standards for the protection of human health and the environment by controlling and remediating, to the extent possible, past releases at the PPG Industries Lake Charles

Complex. PPG Industries has closed all permitted units that were involved in the land disposal of hazardous waste.

Because of the nature and extent of the contamination at the Lake Charles Complex, PPG Industries and LDEQ agreed to address the HSWA corrective action requirements on a site-wide basis. As part of this approach, PPG Industries in the IFCMS has identified six Corrective Action Objectives (CAOs) that must be addressed and met to ensure the protection of human health and the environment. These CAOs are listed below in no particular order.

1. CAO1-Prevention of human exposure to groundwater containing constituents of concern (COCs) at concentrations that exceed the relevant RECAP GWI standards for the 70/80 Foot Water Bearing Unit and the 200 Foot Sand of the Chicot Aquifer;
2. CAO 2-Control to the extent practicable the migration of COCs from source DNAPL (Dense Nonaqueous Phase Liquid) areas to groundwater;
3. CAO 3-Prevention of unacceptable ecological risk associated with exposure to COCs in sediment in the isolated portion of the PPG Canal, the area south of the South Closure, the Lower PPG Canal and the north section of the Sabine River Water Pond;
4. CAO 4-Prevent, to the extent practicable, the migration of COCs from the North Section of the PPG Canal to the Lower PPG Canal or Bayou d'Inde at levels that would cause sediment or surface water to pose an unacceptable ecological risk;
5. CAO 5-Prevent, to the extent practicable, the lateral migration of COCs in groundwater into the Barge Slip, Bayou Verdine, and the Coon Island Reach at levels that would cause sediment or surface water to pose an unacceptable risk; and
6. CAO 6-Control on-site worker dermal contact with or ingestion of, COCs in soils, sediment, and shallow groundwater in accordance with applicable RECAP requirements.

PPG Industries has proposed the selection of final remedies in this draft permit action. PPG Industries has already performed a wide range of corrective actions. Under the HSWA rules, the permittee may institute corrective actions, termed interim corrective measures (ICMs) at the site before the evaluation and selection of the final remedies. Generally, ICMs are proposed for areas that require additional action to prevent, contain or remove contamination in order to be protective of human health and the environment. ICMs are submitted to the LDEQ for approval before

implementation. PPG Industries has proposed and received approval for over 32 ICMs and other remedial actions over a 21 year period.

The proposed final remedies were evaluated per the requirements of RECAP and RCRA/HSWA/CERCLA guidance from EPA. The evaluation process required by the Corrective Measures Study involved the evaluation of the protectiveness of the proposed final remedies. The proposed final remedies are protective of human health and the environment.

B. A cost benefit analysis of the environmental impact balanced against the social and economic benefits of the project demonstrates that the social and economic benefits outweigh environmental impacts.

The PPG Industries Lake Charles Complex has been in operation for several decades. However, this permit only addresses the post-closure and corrective action requirements at the existing facility. The operational requirements for the waste management units at the Lake Charles Complex are addressed under the current RCRA operating permit, LAD 008086506-OP-RN-1. This draft permit addresses corrective action for

Over 1,200 area residents are employed at the PPG Industries Lake Charles Complex. Both the state and local economies benefit from the provision of employment and tax revenue at the PPG Industries Lake Charles Complex.

The proposed permit should have little or no affect on property values or public costs pertaining to the economics of the local community, as the PPG Industries Lake Charles Complex is an existing facility. The proposed permit renewal should not promote the need for additional fire protection, police, medical facilities, or roads. The proposed permit benefits the environment by providing final corrective action for past releases. The cost of the final remedies, as well as the effectiveness and implementability were factors used in evaluating remedy selection under the IFCMS. The proposed final remedies will effectively meet the corrective action objections.

C. There are no alternative projects or alternative sites or mitigating measures which offer more protection to the environment than the proposed project without unduly curtailing non-environmental benefits to the extent applicable.

1. ALTERNATIVE PROJECTS

This draft permit renewal addresses the final remedies PPG Industries is proposing for selection to meet the HSWA and RECAP requirements at the Lake Charles Complex. The public and PPG Industries will have an opportunity during the public comment period to comment on the proposed remedies contained in this draft permit. A basis of decision document that

will accompany the final permit will describe the selected final remedies and explain the rationale behind the remedy selection process. Any comment submitted during the public comment period will be reviewed and considered. If applicable, the final permit and basis of decision document will be edited to address public comments.

In developing the site-wide corrective action remedies for the Lake Charles Complex, PPG Industries and LDEQ considered a number of available actions. The corrective action is organized on a facility site-wide basis but can be categorized into corrective action addressing groundwater contamination, soil contamination, and contamination of sediments.

Under the previous permit, PPG Industries had conducted investigations based on specific areas within the Lake Charles Complex. However, investigations showed that contamination existed over a broad portion of the Lake Charles Complex and involved geologically deep strata including the Chicot Aquifer. As previously discussed, the IFCMS was submitted to the administrative authority to provide a central technical document for the final decision or remedy selection process. Previous to the IFCMS, other remedies and organizational approaches were analyzed to address corrective action at the Lake Charles Complex. Not all these items were discussed in detail in the IFCMS; however, the IFCMS provides a detailed history of the corrective action at the Lake Charles Complex and references to previously submitted documents. For a complete review of the consideration of alternative remedies, see Volumes 3 and 4 of the IFCMS. The following is a summary of the corrective action alternatives that were considered during the remedy selection process as outlined in the IFCMS. These corrective action alternatives are designed to address the CAOs discussed previously.

SOIL

a. No Further Action

The No Further Action was considered only as a baseline for comparison with other alternatives. Under this alternative, no additional remedial action would be undertaken to address soil contamination other than the interim measures already undertaken by PPG Industries as described in the IFCMS. However, this alternative does not meet one of the Corrective Action Objectives proposed for the Lake Charles Complex, since contaminated soil would be left in place in some areas and any further potential contamination to groundwater or potential worker exposure to impacted soil would not be prevented.

b. Soil Excavation

In this alternative, soils containing DNAPL would be removed by excavation to eliminate contamination source material. Excavation of contaminated soils could also serve to eliminate possible worker exposure to contaminated soils. PPG Industries did remove some contaminated soil through excavation in certain areas, as Interim Measure. However, excavation would not be entirely effective at the Lake Charles Complex since impacted soil and groundwater exist below the potential surface soil (0 to 15 feet below ground surface) depth. The large scale excavation and dewatering techniques required would not be able to achieve the necessary depths without destruction of much of the operating plant and associated equipment. Additionally, the locations of all DNAPL sources are not precisely known, and because of the depth at which some of the DNAPL is located, excavation could not be safely and effectively used to remove the affected soils. Finally, the amount of material that would be excavated would be such that there may be insufficient disposal capacity making waste management infeasible. Nevertheless, excavation is retained for possible use with isolated areas of shallow soil at the facility.

c. Soil Capping

Soil capping can be used to provide isolation of ecological and human receptors from contact with contaminated soil or constituents from contaminated soil. In addition, soil capping can be used to reduce the infiltration of water into areas of contamination. One limitation of soil capping is that this alternative can only be effectively implemented in areas of the Lake Charles Complex where it would not interfere with plant operations or equipment. Soil capping would not affect the toxicity or volume of constituents in soil or sediments.

SEDIMENTS

a. No Further Action

The No Further Action was considered only as a baseline for comparison with other alternatives. Under this alternative, no additional remedial action would be undertaken to address sediment contamination other than the interim measures already undertaken by PPG Industries as described in the IFCMS. However, this alternative does not completely address the Corrective Action Objectives proposed for the Lake Charles Complex, since impacted sediment

would be left in place and unmonitored with no barrier to isolate the sediment from potential ecological receptors.

b. In Situ Capping

Sediment in the PPG Canal and northern portions of the Sabine River Water Pond would be capped in situ (i.e., in place) with a designed layer of earthen and synthetic materials that will effectively isolate the impacted sediment from ecological receptors or erosive forces, as needed.

c. Solidification

Sediment in the Isolated Canal north of the Silicas Ditch and in the northern portion of the Sabine River Water Pond would be treated in situ by mixing the sediment with pozzolonic materials, such as Portland cement, to form a low permeability, leach resistant mass. (Pozzolonic materials can be added to concrete mixtures to create concrete that can be poured underwater. In addition, the resulting concrete is resistant to water absorption, corrosion from sulfates and flaking.) The solidified sediment would be capped with soil and vegetation. As with in situ capping, solidification would inhibit exposure of potential receptors to impacted sediment. Solidification would also reduce the leaching of COCs from sediment although it would insignificantly reduce loading to groundwater because the underlying and adjacent affected soil would be unaffected by solidification.

This treatment method is inapplicable to the other sediment areas, primarily because they can not be isolated from surface water or because the underlying soil has insufficient strength to support the additional load of material. In situ capping would be used for the other areas.

d. Removal

Sediments would be removed from the Lower Canal and portions of the Bypass Canal in this alternative. Sediment removal was considered and rejected because it would not remove all targeted sediment and would result in release of COCs into the water column.

GROUNDWATER

a. No Further Action

This alternative was evaluated to establish a baseline for comparison with other alternatives. Under this alternative, the operation of all existing groundwater interim corrective measures would be terminated and no further remedial actions undertaken to address groundwater contamination. Clearly, this alternative would not address the corrective action objectives delineated in this permit or any potential exposure pathways that would require risk management.

b. Operation of Groundwater Source Controls and Containment Systems and Groundwater Treatment Systems

The operation of certain existing groundwater source control and containment systems installed as ICMs, and the groundwater treatment system would be continued under this alternative. The active source control systems at the facility have already removed or are removing DNAPL and/or minimizing the mobility of DNAPL. Thus, source areas are being controlled to the maximum extent practicable. The groundwater containment systems have been in place for many years at the PPG Industries Lake Charles Complex and are operating as designed and provide adequate hydraulic containment of impacted groundwater.

2. ALTERNATIVE SITE

Finding or assessing alternative sites for the projects in this permit is not applicable to the Lake Charles Complex. This draft permit is issued by LDEQ to address existing contamination at the Lake Charles Complex. The pertinent issue is not the selection of a suitable site for this permit, but the development of a remediation or corrective action program for contamination that exists at the Lake Charles Complex. Thus, this draft permit is public noticed to solicit general public comments concerning the permit conditions and, in particular, the remedies selected to address the corrective action requirements at the PPG Industries Lake Charles Complex.

3. MITIGATING MEASURES

This draft permit represents the culmination of over a decade of research and investigation into the extent and nature of existing contamination at the PPG Industries Lake Charles Complex. The RFI and IFCMS were conducted under work plans evaluated and approved by LDEQ. The IFCMS includes

revisions made by PPG Industries to fully address LDEQ's comments. In the IFCMS, PPG Industries has proposed a set of technologies and remedial strategies to meet CAOs and to remediate and to contain the releases of hazardous constituents from the PPG Industries Lake Charles Complex to offsite areas. The final remedies selected are the most effective in addressing the CAOs that can be implemented. No additional mitigating measures offer more protection to the environment without unduly curtailing non-environmental benefits. To assure continued maintenance, the remedial systems, PPG Industries will supply financial assurance for corrective action after the issuance of the permit to the LDEQ. As stated above, the permitting process ensures that any public comments received will be reviewed and considered for incorporation into the final permit document. The permitting process provides additional opportunities for involvement by the public; the permit will be renewed every ten years. Thus, every ten years the permit conditions, including the corrective action objectives and remedies selected, will be reviewed and reconsidered by the administrative authority and the public.

PUBLIC PARTICIPATION

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
PPG INDUSTRIES, INC.
LAKES CHARLES COMPLEX
PUBLIC HEARING AND REQUEST FOR PUBLIC COMMENT ON DRAFT POST-CLOSURE
/HSWA PERMIT RENEWAL

The LDEQ, Office of Environmental Services, will conduct a public hearing to receive comments on draft post-closure/HSWA permit for PPG Industries, Inc., P.O. Box 1000, Lake Charles, Louisiana 70602 for the post-closure care and site-wide corrective action at the PPG Lake Charles Complex. **The facility is located at 1300 PPG Drive, Westlake, Louisiana, 70669, Calcasieu Parish.**

The hearing will be held on **DAY, MONTH DATE, YEAR, beginning at 6:00 p.m., at the PHYSICAL LOCATION OF THE HEARING, CITY, LA.** During the hearing, all interested persons will have an opportunity to comment on the draft permit.

PPG Industries, Inc. proposes to obtain a RCRA hazardous waste permit for post-closure care of the closed Water Treatment Unit.

Implementation and management of the final remedies for the HSWA corrective action requirements at the Lake Charles Complex will also be addressed under this permit. On March 12, 2007, PPG Industries submitted to the Administrative Authority the Integrated Final Corrective Measures Study Report (IFCMS). The IFCMS Report provides a summation of over a decade of investigation and interim corrective measures implemented to address contamination at the Lake Charles Complex. The IFCMS Report reviews the various objectives and remedial alternatives considered and analyzed to protect human health and the environment. Finally, the IFCMS proposes the final remedies and corrective action objectives that would be protective of human health and the environment. This draft permit will serve to finalize the selection of those corrective action objectives and final remedies. This notice provides the public the opportunity to review and make comments on the conditions of the permit. The final permit issued will provide PPG Industries and the Administrative Authority a technical and enforceable document through which to conduct corrective action at the Lake Charles Complex.

Written comments or written requests for notification of the final permit decision regarding this permit may also be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests for notification must be received by 12:30 p.m., DAY, MONTH DATE, YEAR.** Written comments will be considered prior to a final permit decision.

LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The LIST DOCUMENT(S) AVAILABLE FOR REVIEW are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

Additional copies may be reviewed at **NAME AND PHYSICAL ADDRESS OF LIBRARY OR OTHER REPOSITORY.**

Previous notices have been published in the NAME OF NEWSPAPER on MONDAY, JANUARY XX, 2003.

Individuals with a disability, who need an accommodation in order to participate in the public hearing, should contact PUBLIC PARTICIPATION REPRESENTATIVE at the above address or by phone at (225) 219-0000.

Inquiries or requests for additional information regarding this permit action should be directed to Will F. Steele, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3050.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmaillistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the draft permit and associated information can be viewed at the LDEQ permits public notice webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm

All correspondence should specify AI Number 1255, Permit Number LAD008086506-PC/HSWA-RN-1, and Activity Number PER20070003.

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
PPG INDUSTRIES, INC.
LAKES CHARLES CHEMICAL COMPLEX
PUBLIC HEARING AND REQUEST FOR PUBLIC COMMENT ON DRAFT
POST-CLOSURE /HWSA RENEWAL PERMIT

The LDEQ, Office of Environmental Services, will conduct a public hearing to receive comments on draft hazardous waste post-closure/HWSA (Hazardous and Solid Waste Amendments) renewal permit for PPG Industries, Inc., P.O. Box 1000, Lake Charles, Louisiana 70602 for the post-closure care and site-wide remediation at the PPG Lake Charles Chemical Complex. The facility is located at 1300 PPG Drive, Westlake, Calcasieu Parish.

The hearing will be held on Thursday, September 10, 2009, beginning at 6:00 p.m., at the Westlake Council Chambers, 1001 Mulberry Street, Westlake, LA 70669. During the hearing, all interested persons will have an opportunity to comment on the draft hazardous waste permit.

PPG Industries, Inc. proposes to obtain a RCRA hazardous waste permit for implementation and management of the final remedies for the HSWA corrective action requirements at the Lake Charles Complex. On March 12, 2007, PPG Industries submitted to the Administrative Authority the Integrated Final Corrective Measures Study Report (IFCMS). The IFCMS Report is provided the Administrative Authority with a summation of over a decade of investigation and interim corrective measures implemented to address contamination at the Lake Charles Complex. The IFCMS Report reviews the various objectives and remedial alternatives analyzed to protect human health and the environment at the Lake Charles Complex. Finally, the IFCMS proposed the remedies and corrective action objectives that would be protective of human health and the environment. This draft permit will serve to finalize the selection of those corrective action objectives and final remedies. The notice provides the public the opportunity to review and make comments on the conditions of the permit. The final permit issued will provide PPG Industries and the Administrative Authority a technical and enforceable document through which to conduct corrective action at the Lake Charles Complex.

Written comments or written requests for notification of the final permit decision regarding this permit may also be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests for notification must be received by 12:30 p.m., Monday, September 14, 2009.** Written comments will be considered prior to a final permit decision.

LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The draft hazardous waste post-closure/HSWA renewal permit and associated information is available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

Additional copies may be reviewed at the Calcasieu Parish Library, Westlake Branch, 937 Mulberry Street, Westlake, LA 70669 and the Sulphur Regional Branch, 1160 Cypress Street, Sulphur, LA 70663.

Previous notices have been published in the Advocate and The American Press on February 21, 2007.

Individuals with a disability, who need an accommodation in order to participate in the public hearing, should contact Laura Ambeau at the above address or by phone at (225) 219-3277.

Inquiries or requests for additional information regarding this permit action should be directed to Will F. Steele, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3050.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmaillistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the draft permit and associated information can be viewed at the LDEQ permits public notice webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm

All correspondence should specify AI Number 1255, Permit Number LAD008086506-PC/HSWA-RN-1, and Activity Number PER20070003.

Scheduled Publication Date: July 22, 2009

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

7/17/2009

Telephone: (225) 388-1111

Fax: (225) 388-0164

Email: legal.ads@theadvocate.com

Ms. Susan Bush
Legal Advertising
Advocate
P.O. Box 588
Baton Rouge, LA 70821-0588

RE: Public Hearing and Request For Public Comments On a Draft Hazardous Waste Permit
PPG Industries Inc - Lake Charles Complex
A11255, PER20070003, Permit Number LAD008086506-PC/HSWA-RN-1
Westlake, Calcasieu Parish, Louisiana

Dear Ms. Bush:

Please publish the attached legal notice regarding the above referenced facility as a regular legal ad in the Advocate once only on Wednesday, July 22, 2009. You will also receive a copy of the legal notice itself via email. Immediately after publication, please fax a copy of the ad to Ms. Laura Ambeau at (225) 325-8157.

State regulations require that we provide notification to the public and allow sufficient time for public comments. For this department to be assured that adequate notification is provided, we are requesting that you sign and date the enclosed 'Verification by Newspaper', and fax it to the attention of Ms. Laura Ambeau at (225) 325-8157 immediately upon publication. If the notice cannot be published on the date requested, please call me at (225) 219-3277 or email: laura.ambeau@la.gov

Charges for this service should be billed to:

Ms. Tiffany Evans
PPG Industries Inc - Lake Charles Complex
Post Office Box 1000
Lake Charles, LA 70602
Telephone: (337) 708-4557

The official proof of publication in the form of a tear sheet and invoice should be mailed to the attention of Ms. Laura Ambeau, LDEQ, Permits Support Services Division, P.O. Box 4313, Baton Rouge, LA 70821-4313. We appreciate your assistance in our efforts to serve the public.

Sincerely,

Laura Ambeau

Laura Ambeau
Environmental Scientist, Public Participation Group

LA
Attachments

VERIFICATION BY NEWSPAPER

The undersigned verifies that the following public notice was published on the _____ (date of publication) edition of The Advocate:

RE: Public Hearing and Request For Public Comments On a Draft Hazardous Waste Permit
PPG Industries Inc - Lake Charles Complex
A11255, PER20070003, Permit Number LAD008086506-PC/HSWA-RN-1
Westlake, Calcasieu Parish, Louisiana

The Advocate:

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Permits Support Services Division
P.O. Box 4313
Baton Rouge, LA 70821-4313
PHONE (225) 219-3277
FAX (225) 325-8157

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

7/17/2009

Telephone: (337) 494-4039

Fax: (337) 494-4008

Email: adv@americanpress.com

Ms. Karen Dobbins
Legal Advertising
American Press
P.O. Box 2893
Lake Charles, LA 70602

RE: Public Hearing and Request For Public Comments On a Draft Hazardous Waste Permit
PPG Industries Inc - Lake Charles Complex
A11255, PER20070003, Permit Number LAD008086506-PC/HSWA-RN-1
Westlake, Calcasieu Parish, Louisiana

Dear Ms. Dobbins:

Please publish the attached legal notice regarding the above referenced facility as a regular legal ad in the American Press once only on Wednesday, July 22, 2009. You will also receive a copy of the legal notice itself via email. Immediately after publication, please fax a copy of the ad to Ms. Laura Ambeau at (225) 325-8157.

State regulations require that we provide notification to the public and allow sufficient time for public comments. For this department to be assured that adequate notification is provided, we are requesting that you sign and date the enclosed 'Verification by Newspaper', and fax it to the attention of Ms. Laura Ambeau at (225) 325-8157 immediately upon publication. If the notice cannot be published on the date requested, please call me at (225) 219-3277 or email: laura.ambeau@la.gov

Charges for this service should be billed to:

Ms. Tiffany Evans
PPG Industries Inc - Lake Charles Complex
Post Office Box 1000
Lake Charles, LA 70602
Telephone: (337) 708-4557

The official proof of publication in the form of a tear sheet and invoice should be mailed to the attention of Ms. Laura Ambeau, LDEQ, Permits Support Services Division, P.O. Box 4313, Baton Rouge, LA 70821-4313. We appreciate your assistance in our efforts to serve the public.

Sincerely,

Laura Ambeau

Laura Ambeau
Environmental Scientist, Public Participation Group

LA
Attachments

VERIFICATION BY NEWSPAPER

The undersigned verifies that the following public notice was published on the _____ (date of publication) edition of The American Press:

RE: Public Hearing and Request For Public Comments On a Draft Hazardous Waste Permit
PPG Industries Inc - Lake Charles Complex
A11255, PER20070003, Permit Number LAD008086506-PC/HSWA-RN-1
Westlake, Calcasieu Parish, Louisiana

The American Press:

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Permits Support Services Division
P.O. Box 4313
Baton Rouge, LA 70821-4313
PHONE (225) 219-3277
FAX (225) 325-8157

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY ENVIRONMENTAL SERVICES

July 17, 2009

Telephone: (337) 439-3300 ext. 228
Via Fax: (337) 433-7701

Mr. Lance Knoll
Cumulus Broadcasting-Lake Charles
KAOK AM / FM
425 Broad Street
Lake Charles, LA 70601

RE: Public Hearing and Request For Public Comments On a Draft Hazardous Waste Permit
PPG Industries Inc - Lake Charles Complex
AI1255, PER20070003, Permit Number LAD008086506-PC/HISWA-RN-1
Westlake, Calcasieu Parish, Louisiana

Dear Mr. Knoll:

Please broadcast the enclosed public announcement regarding the above referenced facility at the best possible time at the least cost once only on Wednesday, July 22, 2009.

Charges for this announcement should be billed to:

Ms. Tiffany Evans
PPG Industries Inc - Lake Charles Complex
Post Office Box 1000
Lake Charles, LA 70602
Telephone: (337) 708-4557

For this department to be assured that adequate notification is provided, we are requesting that you sign and date the enclosed 'Verification by Radio' form and fax it my attention at (225) 325-8157 as soon as the announcement has been made.

If there is any problem with broadcasting this announcement in its entirety, or if you have any questions, please call me immediately at (225) 219-3277.

Thank you for assisting in our effort to serve the public.

Sincerely,

A handwritten signature in cursive script, appearing to read "Laura Ambeau".

Laura Ambeau
Environmental Scientist
Public Participation Group

/la
Attachment

VERIFICATION BY RADIO STATION

The undersigned verifies that the announcement was broadcast on _____ as requested for:

RE: Public Hearing and Request For Public Comments On a Draft Hazardous Waste Permit
PPG Industries Inc - Lake Charles Complex
A11255, PER20070003, Permit Number LAD008086506-PC/HSWA-RN-1
Westlake, Calcasieu Parish, Louisiana

KAOK AM / FM Cumulus Broadcasting-Lake Charles

Signed: _____ Date: _____

Please complete and mail or fax this form promptly to the address listed below:

Ms. Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Post Office Box 4313
Baton Rouge, La. 70821-4313
FAX: (225) 325-8157

**LDEQ
RADIO ANNOUNCEMENT
DRAFT HAZARDOUS WASTE POST-CLOSURE/HSWA
RENEWAL PERMIT**

The LDEQ, Office of Environmental Services, will conduct a public hearing to receive comments on the draft hazardous waste post-closure/HSWA renewal permit for PPG Industries, Inc., P.O. Box 1000, Lake Charles, Louisiana 70602 for the Lake Charles Chemical Complex. **The facility is located at 1300 PPG Drive, Westlake, Calcasieu Parish.**

The hearing will be held on Thursday, September 10, 2009, beginning at 6:00 p.m., at the Westlake Council Chambers, 1001 Mulberry Street, Westlake, LA 70669. During the hearing, all interested persons will have an opportunity to comment on the draft hazardous waste post-closure permit.

The public comment period will end on Monday, September 14, 2009 at 12:30 p.m.

A copy of the draft hazardous waste post-closure renewal permit is available for review at the Calcasieu Parish Library-Westlake Branch, 937 Mulberry Street, Westlake, LA, the Sulphur Regional Branch, 1160 Cypress Street, Sulphur, LA and the Louisiana Department of Environmental Quality Public Records Center in Baton Rouge, LA.

The detailed public notice is scheduled for publication in the American Press and The Advocate on July 22, 2009.

For any inquiries contact LDEQ Customer Service Center at (225) 219-LDEQ, that is (225) 219-5337.

VERIFICATION BY FACILITY

The undersigned verifies that the PPG Industries, Inc, Lake Charles Chemical Complex has received a copy of the draft hazardous waste post-closure/HSWA renewal permit and public notice regarding:

**RE: Public Hearing and Request For Public Comments On a Draft Hazardous Waste Permit
PPG Industries Inc - Lake Charles Complex
A11255, PER20070003, Permit Number LAD008086506-PC/HSWA-RN-1
Westlake, Calcasieu Parish, Louisiana**

PPG INDUSTRIES INC, LAKE CHARLES CHEMICAL COMPLEX

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Ms. Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
PO Box 4313
Baton Rouge, LA 70821-4313
Phone (225) 219-3277

FAX (225) 325-8157



BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

7/17/2009

Telephone 337- 721-7138
Fax

Ms Esther Pennington
Branch Manager
Calcasieu Parish Library - Sulphur Regional
1160 Cypress St
Sulphur, LA 70663-5111

RE: Public Hearing and Request For Public Comments On a Draft Hazardous Waste Permit
PPG Industries Inc - Lake Charles Complex
A11255, PER20070003, Permit Number LAD008086506-PC/HSWA-RN-1
Westlake, Calcasieu Parish, Louisiana

Dear Ms Pennington:

We request that the enclosed documents for the permitting action for referenced company/facility be made available for public review upon receipt in the Calcasieu Parish Library - Sulphur Regional. It is imperative that these documents are available for review at all times; therefore, they cannot be checked out by anyone at any time.

The documents should be retained during the permitting process. At the close of the permitting period, the Louisiana Department of Environmental Quality, Office of Environmental Services (LDEQ-OES), Hazardous Waste Permits Division will provide written notice to you requesting that the information be removed.

Please complete the attached 'Verification by Library' and mail to Laura Ambeau, LDEQ-OES, Permit Support Services Division, PO Box 4313, Baton Rouge, LA 70821-4313, or Fax (225) 325-8157. We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3277.

Sincerely,

Laura Ambeau

Laura Ambeau
Environmental Scientist, Public Participation Group

LA

Attachments/

VERIFICATION BY LIBRARY

The undersigned verifies that Calcasieu Parish Library - Sulphur Regional, 1160 Cypress St, Sulphur, LA has received a copy of the draft hazardous waste renewal permit associated with the following public notice:

**RE: Public Hearing and Request For Public Comments On a Draft Hazardous Waste Permit
PPG Industries Inc - Lake Charles Complex
A11255, PER20070003, Permit Number LAD008086506-PC/HSWA-RN-1
Westlake, Calcasieu Parish, Louisiana**

Calcasieu Parish Library - Sulphur Regional

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

**Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Permit Support Services Division
P.O. Box 4313
Baton Rouge, LA 70821-4313
PHONE (225) 219-3277
FAX (225) 325-8157**



BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, Ph.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY ENVIRONMENTAL SERVICES

7/17/2009

Telephone 337-721-7113
Fax

Ms Kathy Jones
Branch Manager
Calcasieu Parish Library - Westlake
937 Mulberry St
Westlake, LA 70669-4601

RE: Public Hearing and Request For Public Comments On a Draft Hazardous Waste Permit
PPG Industries Inc - Lake Charles Complex
A11255, PER20070003, Permit Number LAD008086506-PC/HSWA-RN-1
Westlake, Calcasieu Parish, Louisiana

Dear Ms Jones:

We request that the enclosed documents for the permitting action for referenced company/facility be made available for public review upon receipt in the Calcasieu Parish Library - Westlake. It is imperative that these documents are available for review at all times; therefore, they cannot be checked out by anyone at any time.

The documents should be retained during the permitting process. At the close of the permitting period, the Louisiana Department of Environmental Quality, Office of Environmental Services (LDEQ-OES), Hazardous Waste Permits Division will provide written notice to you requesting that the information be removed.

Please complete the attached 'Verification by Library' and mail to Laura Ambeau, LDEQ-OES, Permit Support Services Division, PO Box 4313, Baton Rouge, LA 70821-4313, or Fax (225) 325-8157. We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3277.

Sincerely,

Laura Ambeau

Laura Ambeau
Environmental Scientist, Public Participation Group

LA

Attachments/

VERIFICATION BY LIBRARY

The undersigned verifies that Calcasieu Parish Library - Westlake, 937 Mulberry St, Westlake, LA has received a copy of the draft hazardous waste renewal permit associated with the following public notice:

RE: Public Hearing and Request For Public Comments On a Draft Hazardous Waste Permit
PPG Industries Inc - Lake Charles Complex
A11255, PER20070003, Permit Number LAD008086506-PC/HSWA-RN-1
Westlake, Calcasieu Parish, Louisiana

Calcasieu Parish Library - Westlake

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Permit Support Services Division
P.O. Box 4313
Baton Rouge, LA 70821-4313
PHONE (225) 219-3277
FAX (225) 325-8157

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, Ph.D.
SECRETARY

State of Louisiana

7/17/2009

DEPARTMENT OF ENVIRONMENTAL QUALITY ENVIRONMENTAL SERVICES

Telephone (337) 721-3500
Fax (337) 437-3399

Mr. Tony Stelly
President Calcasieu Parish Police Jury
1015 Pithon Street
Lake Charles, LA , LA 70601

RE: Public Hearing and Request For Public Comments On a Draft Hazardous Waste Permit
PPG Industries Inc - Lake Charles Complex
A11255, PER20070003, Permit Number LAD008086506-PC/HSWA-RN-1
Westlake, Calcasieu Parish, Louisiana

Dear Mr. Stelly:

The Louisiana Department of Environmental Quality (LDEQ) is requesting public comments regarding permitting actions for the PPG Industries Inc - Lake Charles Complex, 1300 PPG Dr, Westlake, LA.

For your reference, attached is a copy of the Public Hearing and the legal notice is scheduled to be published in/or announced on:

KAOK-AM
Advocate
American Press

Wednesday, July 22, 2009
Wednesday, July 22, 2009
Wednesday, July 22, 2009

It is also posted on the LDEQ Website, found at www.deq.state.la.us. Written comments on the Public Hearing may be submitted to Ms. Soumaya Ghosn, LDEQ-OES, Permits Support Services Division, P.O. Box 4313, Baton Rouge, LA 70821-4313. All comments regarding the permit(s) should specify Agency Interest (AI) No. 1255

Should you have any questions, additional permit information may be obtained from Will Steele, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3181. Should you have any questions regarding the public notice, please contact Laura Ambeau, LDEQ, Permit Support Services Division, Permit Support Section, at (225) 219-3277

Please complete the attached 'Verification of Receipt' and mail to Laura Ambeau, LDEQ-OES, Permit Support Services Division, PO Box 4313, Baton Rouge, LA 70821-4313, or Fax (225) 325-8157. We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3277.

Sincerely,

Laura Ambeau
Environmental Scientist, Public Participation Group

LA

Attachments/

VERIFICATION BY PARISH GOVERNMENT

The undersigned verifies that Calcasieu Parish Police Jury, 1015 Pithon Street, Lake Charles, LA has received a copy of the draft hazardous waste renewal permit associated with the following public notice:

RE: Public Hearing and Request For Public Comments On a Draft Hazardous Waste Permit
PPG Industries Inc - Lake Charles Complex
A11255, PER20070003, Permit Number LAD008086506-PC/HSWA-RN-1
Westlake, Calcasieu Parish, Louisiana

Calcasieu Parish Police Jury

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Permits Support Services Division
PO Box 4313
Baton Rouge, LA 70821-4313
PHONE (225) 219-3277
FAX (225) 325-8157



BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

7/17/2009

Telephone (337) 433-0691
Fax (337) 433-9350

Honorable Daniel Cupit
Mayor of Westlake
PO Box 700
Westlake, LA 70669-0700

RE: Public Hearing and Request For Public Comments On a Draft Hazardous Waste Permit
PPG Industries Inc - Lake Charles Complex
AI1255, PER20070003, Permit Number LAD008086506-PC/HSWA-RN-1
Westlake, Calcasieu Parish, Louisiana

Dear Mayor Cupit:

The Louisiana Department of Environmental Quality (LDEQ) is requesting public comments regarding permitting actions for the PPG Industries Inc - Lake Charles Complex, 1300 PPG Dr, Westlake, LA.

For your reference, attached is a copy of the legal notice that is scheduled to be published in/or announced on:

KAOK-AM
Advocate
American Press

Wednesday, July 22, 2009

Wednesday, July 22, 2009

Wednesday, July 22, 2009

It is also posted on the LDEQ Website, found at www.deq.state.la.us. Written comments on the Public Hearing may be submitted to Ms. Soumaya Ghosn, LDEQ-OES, Permits Support Services Division, P.O. Box 4313, Baton Rouge, LA 70821-4313. All comments regarding the permit(s) should specify Agency Interest (AI) No. 1255

Should you have any questions, additional permit information may be obtained from Will Steele, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3181. Should you have any questions regarding the public notice, please contact Laura Ambeau, LDEQ, Permit Support Services Division, Permit Support Section, at (225) 219-3277.

Please complete the attached 'Verification of Receipt' and mail to Laura Ambeau, LDEQ-OES, Permit Support Services Division, PO Box 4313, Baton Rouge, LA 70821-4313, or Fax (225) 325-8157. We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3277.

Sincerely,

Laura Ambeau
Environmental Scientist, Public Participation Group

LA

Attachments/

VERIFICATION BY PARISH GOVERNMENT

The undersigned verifies that the city of Westlake has received a copy of the draft hazardous waste renewal permit associated with the following public notice:

RE: Public Hearing and Request For Public Comments On a Draft Hazardous Waste Permit
PPG Industries Inc - Lake Charles Complex
A11255, PER20070003, Permit Number LAD008086506-PC/HSWA-RN-1
Westlake, Calcasieu Parish, Louisiana

City of Westlake:

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Permits Support Services Division
PO Box 4313
Baton Rouge, LA 70821-4313
PHONE (225) 219-3277
FAX (225) 325-8157

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

7/17/2009

Telephone (214) 665-6750
Fax (214) 665-6762

Mr. Kishor Fruitwala
EPA Region VI
1445 Ross Avenue
Dallas, TX 752022733

RE: Public Hearing and Request For Public Comments On a Draft Hazardous Waste Permit
PPG Industries Inc - Lake Charles Complex
A11255, PER20070003, Permit Number LAD008086506-PC/HSWA-RN-1
Westlake, Calcasieu Parish, Louisiana

Dear Mr. Fruitwala:

The Louisiana Department of Environmental Quality (LDEQ) is enclosing for your review a copy of the permitting action for the above referenced facility.

The legal notice is scheduled to be published in/or announced on:

KAOK-AM

Wednesday, July 22, 2009

Advocate

Wednesday, July 22, 2009

American Press

Wednesday, July 22, 2009

It is also posted on the LDEQ Website, found at www.deq.state.la.us. Written comments on this permit action may be submitted to Ms. Soumaya Ghosn, LDEQ-OES, Permit Support Services Division, P.O. Box 4313, Baton Rouge, LA 70821-4313. All comments regarding the permit(s) should specify Agency Interest (AI) No. 1255

Should you have any questions, additional permit information may be obtained from Will Steele, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3181. Should you have any questions regarding the public notice, please contact me at, (225) 219-3277

Please complete the attached 'Verification of Receipt' and mail to Laura Ambeau, LDEQ-OES, Permit Support Services Division, PO Box 4313, Baton Rouge, LA 70821-4313, or Fax (225) 325-8157. We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3277.

Sincerely,

Laura Ambeau

Laura Ambeau
Environmental Scientist, Public Participation Group

LA

Attachments/ Post Office Box 4313 • Baton Rouge, Louisiana 70821-4313 • Phone 225-219-3181 • Fax 225-219-3309
www.deq.louisiana.gov

VERIFICATION BY EPA

The undersigned verifies that Region VI, 1445 Ross Avenue, Dallas, TX has received a copy of the draft hazardous waste renewal permit associated with the following public notice:

**RE: Public Hearing and Request For Public Comments On a Draft Hazardous Waste Permit
PPG Industries Inc - Lake Charles Complex
A11255, PER20070003, Permit Number LAD008086506-PC/HSWA-RN-1
Westlake, Calcasieu Parish, Louisiana**

EPA Region VI

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

**Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Permit Support Services Division
PO Box 4313
Baton Rouge, LA 70821-4313
PHONE (225) 219-3277
FAX (225) 325-8157**

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, Ph.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY ENVIRONMENTAL SERVICES

7/17/2009

Telephone: (337) 491-2667
Fax (337) 491-2682

Mr. Billy Eakin
Southwest Regional Office Manager
1301 Gadwall Street
Lake Charles, LA 70615-

RE: Public Hearing and Request For Public Comments On a Draft Hazardous Waste Permit
PPG Industries Inc - Lake Charles Complex
A11255, PER20070003, Permit Number LAD008086506-PC/HSWA-RN-1
Westlake, Calcasieu Parish, Louisiana

Dear Mr. Eakin:

We have enclosed a copy of the draft hazardous waste renewal and public notice for the referenced facility for your use and for the public review.

Please complete the attached 'Verification by Regional Office' and Fax to Laura Ambeau, at (225) 325-8157. We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3277.

Sincerely,

A handwritten signature in cursive script, appearing to read "Laura Ambeau".

Laura Ambeau
Environmental Scientist, Public Participation Group

LA

Attachments/

VERIFICATION BY REGIONAL OFFICE

The undersigned verifies that Southwest Regional Office, 1301 Gadwall Street, Lake Charles, LA has received a copy of the draft hazardous waste renewal permit associated with the following public notice:

RE: Public Hearing and Request For Public Comments On a Draft Hazardous Waste Permit
PPG Industries Inc - Lake Charles Complex
A11255, PER20070003, Permit Number LAD008086506-PC/HSWA-RN-1
Westlake, Calcasieu Parish, Louisiana

Southwest Regional Office

By: _____ Date: _____

Please complete and fax this form promptly to the fax number listed below:

Laura Ambeau
Office of Environmental Services
Public Participation Group
PHONE (225) 219-3277
FAX (225) 325-8157



BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Mr. Richard L. Holliday
PPG Industries, Inc.
Post Office Box 1000
Lake Charles, LA 70602

Re: PPG Industries, Inc.- Lake Charles Complex
Draft Hazardous Waste Post-Closure/HSWA Permit Renewal
EPA ID# LAD008086506 / Permit# LAD008086506-PC/HSWA-RN-1
AI No. 1255 / Permit Activity# PER20070003

Dear Mr. Holliday:

Enclosed is your copy of the PPG Industries, Inc., Draft Hazardous Waste Post-Closure/HSWA Permit Renewal, LAD 008086506-PC/HSWA-RN-1, which incorporates language pertaining to post-closure and corrective action activities at the Lake Charles Complex.

A comment period of forty-five (45) days will be allowed in order for the public to review and comment on this draft hazardous waste post-closure permit. A public hearing will also be scheduled at least forty-five (45) days after the date on which the public notice is given. The date, time and location of the public hearing and specific dates for the beginning and ending of the comment period are contained in the public notice that is part of the draft permit package.

Prior to taking a final action on the final permit, the Administrative Authority will consider all significant comments submitted on this action. Written comments must be submitted no later than 12:30 p.m. on the final day of the comment period. The issuance of the final permit decision will be in accordance with LAC 33:V.705.

Please reference your Agency Interest Number 1255, Permit Activity Number 20070003, EPA Identification Number LAD 008086506, and Permit Number LAD008086506-PC/HSWA-RN-1 on all future correspondence pertaining to this issue. Should you have any questions concerning this matter, please contact Mr. Will F. Steele of the Waste Services Section at (225) 219-3050.

Sincerely,

Thomas F. Harris
Administrator
Waste Permits Division

wfs

Enclosure

c. Kishor Fruitwala-EPA Region 6

SIGNATURE PAGE

DRAFT PERMIT

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
HAZARDOUS WASTE POST-CLOSURE/HSWA PERMIT RENEWAL**

PERMITTEE: PPG INDUSTRIES, INC.

PERMIT NUMBER: LAD008086506-PC/HSWA-RN-1
Agency Interest # 1255/ Activity # 20070003

FACILITY LOCATION: 1300 PPG DRIVE
WESTLAKE, LOUISIANA, 70669

This permit is issued by the Louisiana Department of Environmental Quality (LDEQ) under the authority of the Louisiana Hazardous Waste Control Law R.S. 30:2171 et seq., and the regulations adopted thereunder and under the authority of the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) to PPG Industries, Inc., (hereafter called the Permittee), for the Lake Charles Complex located at Westlake, Louisiana, at latitude 30° 13' 027" and longitude 93° 16' 059."

For the purposes of this permit, the "Administrative Authority" shall be the Secretary of the Louisiana Department of Environmental Quality, or his/her designee.

The permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein and the applicable regulations as specified in the permit. Applicable regulations are those which are in effect on the effective date of issuance of this permit.

This permit is based on the assumption that the information provided to LDEQ by the Permittee is accurate. Further, this permit is based in part on the provisions of Sections 206, 212, and 224 of the HSWA of 1984, which modify Section 3004 and 3005 of RCRA. In particular, Section 206 requires corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage or disposal facility seeking a permit, regardless of the time at which waste was placed in such unit.

Section 212 provides authority to review and modify the permit at any time. Any inaccuracies found in the submitted information may be grounds for the termination, modification, revocation, and reissuance of this permit (see LAC 33:V.323) and potential enforcement action. The Permittee must inform the LDEQ of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit shall be effective as of _____, and shall remain in effect

until _____, unless revoked, reissued, modified or terminated in accordance with LAC 33:V.323 and 705 of the Louisiana Hazardous Waste Regulations. The Administrative Authority may issue any permit for a duration that is less than the maximum term of ten (10) years and the term shall not be extended beyond the maximum duration by modification in accordance with LAC 33:V.315.

Post-closure requirements of LAC 33:V. Subchapter B must continue for at least thirty (30) years after the date of closure for those units listed in Condition IV, Table 1 of this permit. Expiration of this permit does not relieve the Permittee of the responsibility to reapply for a permit for the remainder of the thirty (30) year post-closure care period.

Provisions of this permit may be appealed in writing pursuant to LA. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. A request for hearing must be sent to the following:

Louisiana Department of Environmental Quality
Office of the Secretary
Attention: Hearings Clerk, Legal Services Division
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

Draft

Cheryl Sonnier Nolan, Assistant Secretary
Louisiana Department of Environmental Quality

Date

PART A

APPLICATION

SEND COMPLETED FORM TO: The Appropriate State or EPA Regional Office.	United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM		
1. Reason for Submittal (See instructions on page 14.) MARK ALL BOX(ES) THAT APPLY	Reason for Submittal: <input type="checkbox"/> To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities) <input type="checkbox"/> To provide Subsequent Notification of Regulated Waste Activity (to update site identification information) <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application <input checked="" type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____) <input type="checkbox"/> As a component of the Hazardous Waste Report		
2. Site EPA ID Number (page 15)	EPA ID Number L A D 0 0 8 0 8 6 5 0 6		
3. Site Name (page 15)	Name: PPG Industries, Inc.		
4. Site Location Information (page 15)	Street Address: 1300 PPG Drive		
	City, Town, or Village: Westlake	State: Louisiana	
	County Name: Calcasieu	Zip Code: 70669	
5. Site Land Type (page 15)	Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
6. North American Industry Classification System (NAICS) Code(s) for the Site (page 15)	A. 3 2 5 1 8 1	B. 3 2 5 1 9 9	
	C. 3 2 5 1 8 8	D. _____	
7. Site Mailing Address (page 16)	Street or P. O. Box: P.O. Box 1000		
	City, Town, or Village: Lake Charles		
	State: Louisiana		
	Country: US	Zip Code: 70602	
8. Site Contact Person (page 16)	First Name: Esther	MI: S	Last Name: Liggio
	Phone Number: (337) 708-4326 Extension:		Email address: liggio@ppg.com
9. Operator and Legal Owner of the Site (pages 16 and 17)	A. Name of Site's Operator: PPG Industries, Inc.		Date Became Operator (mm/dd/yyyy): 01/01/1947
	Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	B. Name of Site's Legal Owner: PPG Industries, Inc.		Date Became Owner (mm/dd/yyyy): 01/01/1959
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		

EPA ID NO: L A D 0 0 8 0 8 6 5 0 6

OMB#: 2050-0034 Expires 11/30/2005

9. Legal Owner (Continued) Address	Street or P. O. Box: One PPG Place	
	City, Town, or Village: Pittsburgh	
	State: PA	
	Country: US	Zip Code: 15272

10. Type of Regulated Waste Activity

Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 18 to 21.)

A. Hazardous Waste Activities

Complete all parts for 1 through 6.

Y ☒ N ☐ 1. Generator of Hazardous Waste

If "Yes", choose only one of the following - a, b, or c.

☒ a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.)
of non-acute hazardous waste; or☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.)
of non-acute hazardous waste; or☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo.)
of non-acute hazardous waste

In addition, indicate other generator activities.

Y ☐ N ☒ d. United States Importer of Hazardous WasteY ☐ N ☒ e. Mixed Waste (hazardous and radioactive) GeneratorY ☐ N ☒ 2. Transporter of Hazardous WasteY ☐ N ☐ 3. Treater, Storer, or Disposer of
Hazardous Waste (at your site) Note:
A hazardous waste permit is required for
this activity.Y ☐ N ☒ 4. Recycler of Hazardous Waste (at your
site)Y ☐ N ☐ 5. Exempt Boiler and/or Industrial
Furnace

If "Yes", mark each that applies.

☐ a. Small Quantity On-site Burner
Exemption☒ b. Smelting, Melting, and Refining
Furnace ExemptionY ☐ N ☒ 6. Underground Injection Control

B. Universal Waste Activities

Y ☐ N ☒ 1. Large Quantity Handler of Universal Waste (accumulate
5,000 kg or more) [refer to your State regulations to
determine what is regulated]. Indicate types of universal
waste generated and/or accumulated at your site. If "Yes",
mark all boxes that apply:

	<u>Generate</u>	<u>Accumulate</u>
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>	<input type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>

Y ☐ N ☒ 2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

Mark all boxes that apply.

Y ☐ N ☒ 1. Used Oil Transporter

If "Yes", mark each that applies.

☐ a. Transporter☐ b. Transfer FacilityY ☐ N ☒ 2. Used Oil Processor and/or Re-refiner

If "Yes", mark each that applies.

☐ a. Processor☐ b. Re-refinerY ☐ N ☒ 3. Off-Specification Used Oil BurnerY ☐ N ☒ 4. Used Oil Fuel Marketer

If "Yes", mark each that applies.

☐ a. Marketer Who Directs Shipment of
Off-Specification Used Oil to
Off-Specification Used Oil Burner☐ b. Marketer Who First Claims the
Used Oil Meets the Specifications

EPA ID NO: L A D 0 0 8 0 8 6 5 0 6

OMB#: 2050-0034 Expires 11/30/2005

11. Description of Hazardous Wastes (See instructions on page 22.)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

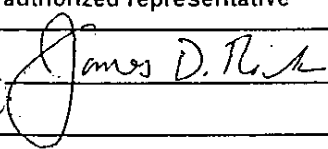
F024						

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.

12. Comments (See instructions on page 22.)

This permit application is only applicable to the WTU Surge Pond which is a surface impoundment that is in post-closure care. During closure activities, all waste was removed and placed in above ground storage tanks. Historically, the WTU Surge Pond contained chlorinated hydrocarbon waste, which was classified as F024.

13. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all operator(s) and owner(s) must sign (see 40 CFR 270.10 (b) and 270.11). (See instructions on page 22.)

Signature of operator, owner, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	James D. Rock - Manager, Operations, Chlor/Alkali & Derivatives	02/02/2007

Hazardous Waste Permit Information Form

OMB# 2050-0034 Expires 10/31/2002

United States Environmental Protection Agency
HAZARDOUS WASTE PERMIT INFORMATION FORM

1. Facility Permit Contact (See instructions on page 35)	First Name: Esther		MI: S	Last Name: Liggio
	Phone Number: 337-708-4326			Phone Number Extension:
2. Facility Permit Contract Mailing Address (See instructions on page 35)	Street or P.O. Box: P. O. Box 1000			
	City, Town or Village: Lake Charles			
	State: LA			
	County: Calcasieu		Zip Code: 70602-1000	
3. Legal Owner Mailing Address and Telephone Number (See instructions on page 35)	Street or P.O. Box: One PPG Place			
	City, Town or Village: Pittsburgh			
	State: PA			
	County:	Zip Code: 15272	Phone Number: 412-434-3131	
4. Operator Mailing Address and Telephone Number (See instructions on page 35)	Street or P.O. Box: P.O. Box 1000			
	City, Town or Village: Lake Charles			
	State: LA			
	County: Calcasieu	Zip Code: 70602-1000	Phone Number: 337-708-4500	
5. Facility Existence Date (See instructions on page 36)	Facility Existence Date (mm/dd/yyyy): 01/1947			

6. Other Environmental Permits (See instructions on page 36)

A. Permit Type (Enter Code)	B. Permit Number	C. Description
N	LA0000761	NPDES/LPDES Permit
P	PSD-LA642, PSD- LA-637	Temporary Boilers, RS Cogen
R	GDS08-11, LAD008086506PC-1, LAD008086506, P-0189	RCRA Operating Permit, Hazardous Waste Permit, Post-Closure Permit, Solid Waste Permit
F	Please see attached sheet	
E	Please see attached sheet	

7. Nature of Business (Provide a brief description; see instructions on page 37)

PPG Industries, Inc., Lake Charles, LA is a heavy industrial chemical manufacturing facility producing both inorganic and halogenated (C2) organic compounds, including the following: Chlorine, Sodium Hydroxide, Amorphous Silica Products, Perchloroethylene, Trichloroethylene, Muriatic Acid, Vinyl Chloride, Methyl Chloroform, Sodium Silicate, Ethylene Dichloride, Hydrogen, Ethyl Chloride, Trans-1,2-Dichloroethene.

This permit application is only applicable to the WTU Surge Pond which is a surface impoundment that is in post-closure care. During closure activities, all waste was removed and placed in above ground storage tanks (ASTs). Historically, the WTU Surge Pond contained chlorinated hydrocarbon waste, which was classified as F024 waste.

8. Process Codes and Design Capacities (See Instructions on page 37)

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item 9.

B. PROCESS DESIGN CAPACITY - For each code entered in column A, enter the capacity of the process.

1. AMOUNT - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code in column B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.

C. PROCESS TOTAL NUMBER OF UNITS - Enter the total number of units for each corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
D79	Disposal Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
D80	Landfill	Acres-feet; Hectare-meter; Acres; Cubic Meters; Hectares; Cubic Yards	T82	Lime Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
D81	Land Treatment	Acres or Hectares	T83	Aggregate Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T84	Phosphate Kila	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards	T85	Coke Oven	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
D99	Other Disposal	Any Unit of Measure Listed Below	T86	Blasi Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
S01	Storage Containment	Gallons; Liters; Cubic Meters; or Cubic Yards	T87	Smelting, Melting, or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide Chloride Oxidation Reactor	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
S03	Waste Pile	Cubic Yards or Cubic Meters	T89	Methane Reforming Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
S04	Surface Impoundment Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T90	Pulping Liquor Recovery Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
S05	Drip Pad	Gallons; Liters; Acres; Cubic Meters; Hectares; or Cubic Yards	T91	Combustion Device Used in The Recovery Of Sulfur Values From Spent Sulfuric Acid	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
S06	Containment Building Storage	Cubic Yards or Cubic Meters	T92	Halogen Acid Furnaces	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
S99	Other Storage	Any Unit of Measure Listed Below	T93	Other Industrial Furnaces Listed in 40 CFR §268.10	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
T01	Treatment Task Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour	T94	Containment Building - Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
T02	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour	X01	Miscellaneous (Subpart X) Open Burial/Open Detonation	Any Unit of Measure Listed Below
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour	X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Day; Liters Per Day; or Million Btu Per Hour	X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; Btu Per Hour; or Million Btu Per Hour	X04	Geologic Repository	Cubic Yards; Cubic Meters; Acres-feet; Hectare-meter; Gallons; or Liters
			X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons.....	G	Short Tons Per Hour.....	D	Cubic Yards.....	Y
Gallons Per Hour.....	E	Metric Tons Per Hour.....	W	Cubic Meters.....	C
Gallons Per Day.....	U	Short Tons Per Day.....	N	Acres.....	B
Liters.....	L	Metric Tons Per Day.....	S	Acres-feet.....	A
Liters Per Hour.....	H	Pounds Per Hour.....	J	Hectares.....	Q
Liters Per Day.....	V	Kilograms Per Hour.....	R	Hectare-meter.....	F
		Million Btu Per Hour.....	X	Btu Per Hour.....	I

8. Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 8 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units			For Official Use Only				
					(1) Amount (Specify)	(2) Unit of Measure (Enter Code)								
X-1	1	D	8	3	0	NA	1							
	2													
	3													
	4													
	5													
	6													
	7													
	8													
	9													
1	0													
1	1													
1	2													
1	3													

NOTE: IF you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item 9.

9. Other Processes (See instructions on page 37 and follow instructions from Item 8 for D99, S99, T04 and X99 process codes)

Line Number		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	D. Description of Process
					(1) Amount (Specify)	(2) Unit of Measure (Enter Code)		
X-2	1							
	2							
	3							
	4							
	5							
	6							

10. Description of Hazardous Wastes (See instructions on page 37)

- A. EPA HAZARDOUS WASTE NUMBER** – Enter the four digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261, Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** – For each listed waste entered in column A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** – For each quantity entered in column B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate the waste will be stored, treated, and/or disposed at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

- Enter the first two as described above.
- Enter '000' in the extreme right box of Item 10.D(1)
- Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 10.E.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in Item 10.D(2) or in Item 10.E(2)

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous waste that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on the line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING Item 10 (shown in line numbers X-1, X-2, X-3, and X-4 below) – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA Hazardous Waste No. (Enter Code)					B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES									
								(1) PROCESS CODES (Enter code)								(2) PROCESS DESCRIPTION (If a code is not entered in D(1))	
X 1	K	0	5	4		900	P	T	0	3	D	8	0				
X 2	D	0	0	2		400	P	T	0	3	D	8	0				
X 3	D	0	0	1		100	P	T	0	3	D	8	0				
X 4	D	0	0	2													Included With Above

10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)																
Line Number	A. EPA Hazardous Waste No. (Enter Code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES									
							(1) PROCESS CODES (Enter code)									
1	F	0	2	4	0	NA	D	8	3						THE WTU SURGE POND IS IN POST-CLOSURE CARE. ALL WASTE WAS REMOVED DURING CLOSURE ACTIVITIES AND PLACED IN ABOVE GROUND STORAGE TANKS.	
2																
3																
4																
5																
6																
7																
8																
9																
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11. Map (See instructions on page 38)

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluid underground. Include all springs, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

- The legal boundaries of the facility;
The legal boundaries of the facility can be seen in Figures 1 and 7 of this permit application. An aerial photograph has also been supplied as Figure 12 to show a 2-mile area surrounding the facility.
- The location of each of the existing and proposed intake and discharge structures;
A site drainage map has been provided as Figure 18 of this permit application.
- All hazardous waste management facilities;
The hazardous waste facility locations can be seen in Figure 8 of this permit application.
- Location of all processes listed in Items 8 and 9 identified by process code and line number in the item;
The only waste that is listed above is F024; however, the WTU Surge Pond is in post-closure care and all waste was removed during closure activities and placed in above ground storage tanks. The WTU Surge Pond can be seen in Figure 17 as item number 22.
- Each well where you inject fluids underground; and
There are currently no injection wells at the PPG, Lake Charles Facility.
- All springs and surface water bodies in the area, plus all drinking water wells within 1/4 mile of the facility which are identified in the public record or otherwise known to you.
Figures 1 and 3 show surface water bodies at the PPG facility and surrounding area. There are no drinking water wells within 1/4 mile of the facility.

12. Facility Drawing (See instructions on page 39)

A scaled drawing of the facility that provides the site boundary has been provided as Figure 1 of this permit application. Figure 17 shows the location of the WTU Surge Pond as Item number 22.

13. Photographs (See instructions on page 39)

An aerial photograph of the PPG facility showing the location of the WTU Surge Pond has been provided as Figure 26 of this permit application.

14. Comments (See instructions on page 39)

The WTU Surge Pond is a unit at the PPG Lake Charles facility that is in post-closure care. All waste was removed during closure activities and placed in above ground storage tanks. This permit application covers the WTU Surge Pond and the Corrective Measures discussed in the Integrated Final Corrective Measures Study Report (IFCMS). Please refer to the cover letter for a detailed description of the scope of this permit application.

**ADDITIONAL ENVIRONMENTAL PERMITS
POST-CLOSURE AND CORRECTIVE MEASURES PERMIT**

PPG Industries, Inc.
Lake Charles, Louisiana
LAD008086506

AI 1255

Page 1 of 2

PERM. NO.	PERM. DESC.	APPROVED DATE	EXPIRES DATE
War Department	War Department Permit	17-Mar-47	
LMNKD 800.6 (old)	LMNKD 800.6 (old river) 3	28-Dec-50	
LMNKD 800.6 (old)		06-Apr-51	
LMNOD SP 5	Dredge and Fill Section Permit LMNOD SP (Old River) 5	10-Aug-53	
LMNKD 800.6 (old)	LMNKD 800.6 (Old River) 6	28-Oct-53	
442	Triethane 2 Plant	08-Apr-75	21-Feb-05
698	Triethane 2 OHC Plant	15-Feb-77	21-Feb-05
1154T	MC Storage	09-May-79	
1658T	Powerhouse C Distillate Storage Tank	28-Dec-81	24-May-02
1430T	A Chlorine	03-Mar-83	15-Apr-03
290	Caustic/Chlorine Plant	03-Mar-83	15-Apr-03
1873T	Hi-Sil AP Products	21-Jul-83	27-Jun-91
32	SW (Bayou D'Inde) 32	01-Jan-89	
29	SW (Bayou D'Inde) 29	21-Jul-89	
33	SW (Bayou D'Inde) 33	01-Jan-90	
2085	Silicas Plant	27-Jun-91	14-Feb-92
2105	EDC/VDCM/TRANS PLANTS	13-Dec-91	
2085 (M-1)	Silicas Plant	14-Feb-92	28-Apr-94
2206	South Terminal	18-Aug-93	
2216	Waste Recovery Unit	20-Sep-93	25-Oct-94
2231	Mercury Recovery Unit	08-Nov-93	
2085 (M-2)	Silicas Plant	28-Apr-94	02-Mar-95
2269	Derivatives Wastewater	21-Jul-94	
2270	Per/Tri Production Unit	21-Jul-94	
2216 (M-1)	Waste Recovery Unit	25-Oct-94	29-Jun-04
38 Nationwide	Nationwide 38	01-Jan-95	
2297	North Dock	02-Feb-95	
2040 (M-1)	Hazardous Waste Incinerators	20-Feb-95	21-Feb-05
2085 (M-3)	Silicas Plant	02-Mar-95	08-Sep-95
2262 (M-1)	#5 Incinerator	01-Jun-95	11-Mar-96
2085 (M-4)	Silicas Plant	08-Sep-95	15-Jul-96
897C (M-1)	Vinyl Chloride Unit Expansion	20-Sep-95	26-Sep-97
2350	EDC/VDCM/Trans State Permit	09-Nov-95	21-Feb-05
923T	VDCM EXPANSION (1978) - [NOW COVERED BY PERMIT NO.	09-Nov-95	21-Feb-05
2359	Complex Fuel Storage	27-Dec-95	
33 Nationwide	Nationwide 33	01-Jan-96	
2262 (M-2)	#5 Incinerator	11-Mar-96	
1476T (M-2)	Waste Clarifier/Derivatives Plant equipment leaks State Permit	07-Jun-96	
2085 (M-5)	Silicas Plant	15-Jul-96	
2454	WTU DH Product Tank	12-Feb-97	29-Jun-04
897C (M-2)	PHH	26-Sep-97	
2521	MC/EDC Dock Storage Tanks	18-Mar-98	19-Sep-00
404 Dock B	Dredge and Fill Section 404	01-Jan-99	
0520-00210-00	Small Source Permit for Sulphur Brine Field	05-Jan-99	
0520-00211-00	Small Source Permit for Starks Brine Field	06-Jan-99	
2597	#3 EDC Storage Tank	26-Feb-99	
1929-V0	CPC Title V Operating Permit	05-Apr-99	03-May-04
2229-V0	Derivatives Shipping Unit Operating Permit	05-Apr-99	

**ADDITIONAL ENVIRONMENTAL PERMITS
POST-CLOSURE AND CORRECTIVE MEASURES PERMIT**

PPG Industries, Inc.
Lake Charles, Louisiana
LAD008086506

AI 1255
Page 2 of 2

PERMIT NUMBER	PERMIT DESCRIPTION	APPROVAL DATE	EXPIRATION DATE
2645	Per/Tri Feed Tank No. 6302	09-Nov-99	29-Jun-04
2646 V0	Title V Operating Permit Temporary Boilers	23-Nov-99	
2106 V1	Powerhouse C Cogeneration Facility	13-Dec-99	
2521 (M-1)	MC/EDC Dock Storage Tanks	19-Sep-00	
2681	Per/Tri Feed Tank No. 6303	03-Oct-00	29-Jun-04
2682	Silicas Backup Emergency Generators	11-Oct-00	
2695	TCF/Tetra tank	27-Nov-00	21-Feb-05
2646 IV0	R. S. COGEN Acid Rain Permit for Riverside Boilers	18-Dec-00	18-Dec-05
2726	Per/Tri No. 8 Auxilliary Still Line Feed Tank	19-Jun-01	
2752	Abrasive Blast Booth Facility	12-Oct-01	
2817	Per/Tri Feed Tank No. 6301	20-Sep-02	29-Jun-04
2828	Per/Tri No. 3 Auxilliary Still Line Feed Tank	05-Dec-02	
2798-V0	Chlor-Alkali Plant Part 70 Operating permit	15-Apr-03	
2216-V0	Waste Recovery Unit Title V	29-Jun-04	29-Jun-09
2040-V0	Incinerators Area Title V	21-Feb-05	
2695-V0	TE-2 Unit Title V	21-Feb-05	
2350-V0	Greater EDC Title V	21-Feb-05	
897-V0		07-Jul-05	
2085-V2		07-Dec-05	
LAG480545	Starks Brine Field General Permit	13-Jan-06	
LAG480546	Sulphur Brine Fields General Permit	23-Jan-06	
2231-V0		03-Mar-06	
2106-V2		20-Mar-06	
2206-V0	Derivatives Docks	29-Jun-06	
2359-V0	Lake Charles Complex - Complex Support Facilities	29-Jun-06	
2270-V0	Per/Tri Title V Permit	29-Jun-06	
2229-V1	Part 70 Operating Permit Renewal Lake Charles Complex	29-Jun-06	
2269-V0	Wastewater Title V Permit	29-Jun-06	

Addendum to Permit Application Form


Media Type (check one)

Hazardous Waste ☐ Air ☐
 Solid Waste ☐ Water ☐
 Radiation Licensing ☐

Agency Interest Number: 1255Is this a copy of a previously submitted form? Yes ☐ No ☒

If yes, indicate the original submittal date: _____

If yes, indicate the original permit number: _____

Department of Environmental Quality Permits Division P.O. Box 4313 Baton Rouge, LA 70821-4313 (225) 219-3181		Addendum to Permit Applications per LAC 33:I.1701			
Please Type Or Print	Company Name		<input checked="" type="checkbox"/> Owner	For Permit Division Use Only	
	PPG Industries, Inc.		<input type="checkbox"/> Operator		
	Parent Company (If Company Name given above is a division)				
	Plant name (if any)				
	Nearest town Lake Charles		Parish where located Calcasieu		

1. Does the company or owner have federal or state environmental permits identical to, or of a similar nature to, the permit for which you are applying in other states? (This requirement applies to all individuals, partnerships, corporations, or other entities who own a controlling interest of 50% or more in your company, or who participate in the environmental management of the facility for an entity applying for the permit or an ownership interest in the permit.)

☒ Permits in Louisiana. List Permit Numbers: PER19990002

☒ Permits in other states (list states): California, Ohio, Texas, West Virginia

2. Do you owe any outstanding fees or final penalties to the Department? No ☒ Yes ☐
 If yes, please explain. _____

3. Is your company a corporation or limited liability company? No ☐ Yes ☒ If yes, attach a copy of your company's Certificate of Registration and/or Certificate of Good Standing from the Secretary of State.

Certification:

I certify, under provisions in Louisiana and United States law which provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information contained in this Addendum to the Permit Application, including all attachments thereto are true, accurate, and complete.

Responsible Official

Name
James D. Rock
Title
Manager, Operations, Chlor/Alkali & Derivatives
Company
PPG Industries, Inc.
Suite, mail drop, or division
Lake Charles Facility
Street or P.O. Box
P.O. Box 1000

City	State	Zip
Lake Charles	LA	70602
Business phone		
(337) 708-4500		
Signature of responsible official(s)		
<i>James D. Rock</i>		
Date		
	02/02/07	



Louisiana Secretary of State COMMERCIAL DIVISION Corporations Database



Louisiana Secretary of State Detailed Record

Charter/Organization ID: 19806000F

Name: PPG INDUSTRIES, INC.

Prior Name: PITTSBURGH PLATE GLASS COMPANY (4/11/1968)

Type Entity: Business Corporation (Non-Louisiana)

Status: Active

Annual Report Status: In Good Standing

[Add Certificate of Good Standing to Shopping Cart](#)

Last Report Filed on 06/05/2006

Mailing Address: ONE PPG PLACE (TAX DEPT.), PITTSBURGH, PA 15272

Domicile Address: ONE PPG PLACE, PITTSBURGH, PA 15272

Principal Office: ONE PPG PLACE, PITTSBURGH, PA 15272

Principal Bus. Est. in Louisiana: 1300 HIBERNIA BANK BUILDING, NEW ORLEANS, LA 70112

Qualified: 06/27/1947

Registered Agent (Appointed 3/21/1989): THE PRENTICE-HALL CORPORATION SYSTEM, INC, 320 SOMERULOS STREET, BATON ROUGE, LA 70802-6129

Officer: CHARLES E. BUNCH, ONE PPG PLACE, PITTSBURGH, PA 15272

Director: CHARLES E. BUNCH, ONE PPG PLACE, PITTSBURGH, PA 15272

Vice President: WILLIAM H. HERNANDEZ, ONE PPG PLACE, PITTSBURGH, PA 15272

Vice President: JAMES C. DIGGS, ONE PPG PLACE, PITTSBURGH, PA 15272

Secretary: JAMES C. DIGGS, ONE PPG PLACE, PITTSBURGH, PA 15272

Additional officers may exist on document

Amendments on File

STMT OF CHG OR CHG PRIN BUS OFF (FOREIGN (09/26/2005)
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STMT OF CHG OR CHG PRIN BUS OFF (FOREIGN (10/08/1991)
STMT OF CHG OR CHG PRIN BUS OFF (FOREIGN (03/21/1989)
STMT OF CHG OR CHG PRIN BUS OFF (FOREIGN (04/01/1986)
STMT OF CHG OR CHG PRIN BUS OFF (FOREIGN (02/22/1985)
STMT OF CHG OR CHG PRIN BUS OFF (FOREIGN (08/08/1977)
AMENDMENT (07/29/1977)
MERGER (04/23/1976)
STMT OF CHG OR CHG PRIN BUS OFF (FOREIGN (10/16/1975)
AMENDMENT (01/13/1969)
RESTATED ARTICLES (05/29/1968)
NAME CHANGE (04/11/1968)
AMENDMENT (05/15/1958)
AMENDMENT (06/13/1952)

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ATTACHMENT 2.....	CORRECTIVE ACTION OBJECTIVES
ATTACHMENT 3.....	REPORTING REQUIREMENTS- ANNUAL AND OTHER REPORTING REQUIREMENTS
ATTACHMENT 4.....	IMPLEMENTATION SCHEDULE
ATTACHMENT 5.....	SITEWIDE ANALYTE LIST
ATTACHMENT 6.....	SPECIFIC HSWA REQUIREMENTS

BODY OF PERMIT

DRAFT

HAZARDOUS WASTE POST-CLOSURE/HSWA PERMIT RENEWAL

**PPG Industries, Inc.
Post-Closure and Site-Wide Corrective Action
EPA ID# LAD 008 086 506
Westlake, Louisiana
Calcasieu Parish**

**Agency Interest # 1255 / PER20070003
Permit Number LAD 008086506 PC/HSWA-RN-1**

I. PERMIT PREAMBLE

This permit is issued to PPG Industries, Inc., hereinafter referred to as the Permittee, by the Louisiana Department of Environmental Quality (LDEQ) under authority of the Louisiana Hazardous Waste Control Law, La. R.S. 30:2171 et seq., and the regulations adopted thereunder.

For the purposes of the permit, "administrative authority" shall mean the Secretary of the Department of Environmental Quality, or his/her designee.

This permit is based on information submitted in the permit application, and all subsequent amendments, and on the Permittee's certification that such information is accurate and that all facilities were or will be maintained and operated as specified in the application.

This permit is conditioned upon full compliance with all applicable provisions of the Louisiana Hazardous Waste Control Law, La. R.S. 30:2171 et. seq., and the regulations adopted thereunder.

All definitions contained in this permit shall have the meaning as defined in the Louisiana Administrative Code (LAC), Title 33, Part V, Subpart 1 unless otherwise stated herein.

All regulating citations are defined as being the regulation in effect on the date of issuance of this permit, except as provided by LAC 33:V.307. New and/or amended regulations are not included as permit requirements until permit modification procedures as specified in Condition II.C of this permit are completed.

GLOSSARY OF TERMS

For the purpose of this Permit, terms used herein shall have the same meaning as those in LAC 33:V.Subpart 1, the Risk Evaluation/Corrective Action Program (LAC 33:I.Ch.13) and the Corrective Action Strategy (CAS) Guidance Document (see Condition VIII) unless the context of use in this Permit clearly indicates otherwise. (The CAS guidance document is intended to supplement, not replace, previous guidance issued by EPA regarding RCRA corrective action and is not meant to supersede State legislated cleanup programs.) Where terms are not otherwise defined, the meaning otherwise associated with such terms shall be as defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

“Administrative Authority” means the Secretary of the Louisiana Department of Environmental Quality or his/her designee (including appropriate assistant secretary).

“Application” refers to the RCRA Part B Permit Application and subsequent amendments submitted by the Permittee for obtaining a permit.

“Area of Concern” (AOC) means any discernable unit or area which, in the opinion of the Administrative Authority, may have received solid or hazardous waste or waste containing hazardous constituents at any time. The Administrative Authority may require investigation of the unit or area to determine if it should be included in the permit.

“Area of Investigation” (AOI) is a zone contiguous to and including impacted media defined vertically and horizontally by the presence of one or more constituents in concentrations exceeding the limiting SS, MO-1 RS, or MO-2 RS (depending on the option being implemented).

“Constituents of Concern” (COC) means the COPC’s that pose a significant risk.

“Conceptual Site Model” (CSM) is part of the Data Quality Objective (DQO) process that presents a three-dimensional picture of site conditions at a discrete point in time that conveys what is known about the facility, releases, release mechanisms, contaminant fate and transport, exposure pathways, potential receptors, and risks. The information for the CSM is documented into six profiles. The CSM evolves as data gaps in the profiles become more complete, and will be refined based upon results of site characterization data. The final CSM is documented in the Risk Management Plan (RMP).

“CWA” means Clean Water Act 33USC§1251 et seq.

“Corrective Action” is an activity conducted to protect human health and the environment.

“Dense Non-aqueous Phase Liquid (DNAPL)” is a dense liquid not dissolved in water, commonly referred to as “free product.”

“Department” means the Louisiana Department of Environmental Quality (LDEQ).

"EPA" means the United States Environmental Protection Agency.

"Facility" means, (1) for the purpose of conducting corrective action under LAC 33:V.3322 and Condition VIII of the permit, all the contiguous property under the control of the Permittee, or (2) all contiguous land and structures, other appurtenances, and improvements on the land used for treating, storing, or disposing of hazardous waste. For purposes of this permit, this definition applies to the Wastewater Treatment Unit as addressed in the body of the permit.

"HSWA" means the 1984 Hazardous and Solid Waste Amendments to RCRA.

"Hazardous Constituent" means a constituent that caused the Administrative Authority to list the hazardous waste in part 40 CFR 261, Subpart D or a constituent listed in Table 1 of 40 CFR 261.24.

"LDEQ" means the Louisiana Department of Environmental Quality.

"Light Non-aqueous Phase Liquid (LNAPL)" is a light liquid not dissolved in water, commonly referred to as "free product."

"Newly-discovered Release" is any release(s) of hazardous waste, including hazardous constituents, in which there is a statistically significant increase over the background data for the media of concern, during the course of groundwater monitoring, field investigation, environmental auditing, or by other means.

"Operating Record" means written or electronic records of all maintenance, monitoring, inspection, calibration, or performance testing—or other data as may be required—to demonstrate compliance with this permit, document noncompliance with this permit, or document actions taken to remedy noncompliance with this permit. A minimum list of documents that must be included in the operating record is identified at LAC 33:V.1529.B.

"Permittee" means PPG Industries Inc., 1300 PPG Drive, Westlake, Louisiana 70669, Calcasieu Parish.

"RCRA Permit" means the full permit, with RCRA and HSWA portions.

"RFA" means RCRA Facility Assessment.

"RFI" means RCRA Facility Investigation.

"Release" means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping or disposing of hazardous wastes (including hazardous constituents) into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous constituents).

"SARA" means Superfund Amendments and Reauthorization Action of 1986.

"Solid Waste Management Unit" (SWMU) means any discernable unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released.

"Stabilization" is an action taken for the purpose of controlling or abating threats to human health or the environment from releases or preventing or minimizing the further spread of contaminants while long-term remedies are pursued.

All regulatory citations are defined as being the regulations in effect on the date of issuance of this permit. New and/or amended regulations are not included as Permit requirements until permit modification procedures as specified in Condition II.C of the permit and LAC 33:V.321 are completed.

II. GENERAL PERMIT CONDITIONS

II.A. DURATION OF PERMIT

This permit is effective as of the date indicated on the accompanying signature page and shall remain in effect for a maximum period of ten (10) years from the effective date, unless suspended, modified, revoked and reissued or terminated for just cause.

II.B. EFFECT OF PERMIT

This permit authorizes the Permittee to conduct post-closure care associated with the Wastewater Treatment Unit and corrective action activities in accordance with the conditions of this permit. The Permittee is prohibited from any storage, treatment or disposal of hazardous waste not authorized by statute, regulation or this permit. Compliance with this permit, LAC 33:V.Subpart I, except for those requests included in the permit under LAC 33:V.307.A.1-4, and HSWA, constitutes compliance for purposes of enforcement, with Subtitle C of RCRA and Chapter 9 of the Louisiana Environmental Quality Act (Act), La R.S. 30:2001 et. seq. However, compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, or under Section 106 (a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) {42 U.S.C. 9606 (a)}.

In accordance with LAC 33:V.307.B and C, issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations.

II.C. PERMIT ACTIONS

Any inaccuracies found in the permit application may be cause for revocation or modification of this permit. The Permittee must inform the Administrative Authority of any deviation from, changes or inaccuracies in the information in the permit application.

The Administrative Authority may also suspend, modify, revoke and reissue, or terminate for cause when necessary to be protective of human health or the environment as specified in 40 CFR 270.41, 270.42, 270.43 or LAC 33:V.309.F, 311.A or 323. The Administrative Authority may modify the permit when the standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulations or by judicial decision after the permit was issued. The filing of a request for permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of Permittee does not stay the applicability or enforceability of any permit condition.

II.D. SEVERABILITY

The conditions of this permit are severable and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

II.E. DUTIES AND REQUIREMENTS

II.E.1. Duty to Comply

The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance may be authorized by an emergency permit. Any permit noncompliance, other than noncompliance authorized by an emergency permit (LAC 33:V.701), constitutes a violation of the LAC 33:V.Subpart 1 and the Act and is grounds for enforcement action which may include permit termination, permit revocation and reissuance, permit modification, or denial of permit renewal application.

II.E.2. Duty to Reapply

If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must reapply for the permit as required by the LAC 33:V.303.N and 309.B. Notification shall be at least 180 calendar days before the permit expires.

II.E.3. Permit Extension

This permit and all conditions herein will remain in effect beyond the permit's expiration date until the Administrative Authority issues a final decision on the re-application, provided the Permittee has submitted a timely, complete new permit application as provided in LAC 33:V.309.B and 315.A.

II.E.4. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

II.E.5. Duty to Mitigate

The Permittee shall immediately take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit as required by LAC 33:V.309.D.

II.E.6. Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related ancillary equipment) that are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

II.E.7. Duty to Provide Information

The Permittee shall furnish to the Administrative Authority, within a reasonable time, any information which the Administrative Authority may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Administrative Authority upon request, copies of records required by this permit and in accordance with LAC 33:V.309.H.

II.E.8. Inspection and Entry

The Permittee shall allow the Administrative Authority or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

II.E.8.a. enter upon the Permittee's premises where a regulated activity is located or conducted, or where records must be maintained under the conditions of this permit;

II.E.8.b. have access to and copy, at reasonable times, any records that must be maintained under the conditions of this permit;

II.E.8.c. inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operation regulated or required under this permit; and

II.E.8.d. sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Administrative Authority any substances or parameters at any location.

II.E.9. Sample Monitoring and Records

II.E.9.a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method

from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods; "SW-846", latest revision; Manual of Groundwater Quality Sampling Procedures, 1981, EPA-600/2-81-160, as revised; Procedures Manual for Groundwater Monitoring at Solid Waste Disposal Facilities, 1977, EPA-530/SW-611, as revised; or an equivalent method.

II.E.9.b. Records of monitoring information, in accordance with LAC 33:V.309.J.3, shall include but not be limited to:

II.E.9.b.(1) the date, exact place, and time of sampling or measurements;

II.E.9.b.(2) the name(s) and signature(s) or initial(s) of the individual(s) who performed the sampling or measurements;

II.E.9.b.(3) the date(s) analyses were performed;

II.E.9.b.(4) the name(s) and signature(s) or initials(s) of the individual(s) who performed the analyses;

II.E.9.b.(5) the analytical techniques or methods used;

II.E.9.b.(6) the results of such analyses; and

II.E.9.b.(7) associated quality assurance performance data.

II.E.9.c. Laboratory Quality Assurance/Quality Control

In order to ensure the accuracy, precision, and reliability of data generated for use, the Permittee shall submit a statement, certified as specified in LAC 33:V.513 and included in the annual report, indicating that:

II.E.9.c.(1) any commercial laboratory providing analytical results and test data to the LDEQ required by this permit is accredited by the Louisiana Environmental Laboratory Accreditation Program (LELAP) in accordance with LAC 33:I. Subpart 3, Chapter 45. Laboratory data generated by commercial laboratories not accredited under LELAP will not be accepted by the LDEQ.

LAC 33:I. Subpart 3 (Chapters 45-49) provides requirements for the accreditation program. Regulations and a list of labs that have applied for accreditation are available on the LDEQ website: <http://www.deq.louisiana.gov/portal/tabid/2412/Default.aspx>.

In accordance with LAC 33:I.4501, the requirements for LELAP accreditation applies whenever data is:

- submitted on behalf of a facility;
- required as part of a permit application;
- required by order of the LDEQ;
- required to be included in a monitoring report submitted to the LDEQ;
- required to be submitted by contract; or
- otherwise required by the LDEQ regulations.

II.E.9.c.(2) If the Permittee decides to use their own in-house laboratory for test and analysis, the laboratory is not required to be accredited by LELAP. However, the laboratory must document all quality assurance/quality control procedures used to generate data for the LDEQ.

II.E.9.c.(3) For approval of equivalent testing or analytical methods, the Permittee may petition for a regulatory amendment under LAC 33:V.105.I and LAC 33:I.Chapter 9. In cases where an approved methodology for a parameter/analyte is not available or listed, a request to utilize an alternate method shall be submitted to the Administrative Authority for approval. Documentation must be submitted to the LDEQ that will verify that the results obtained from the alternate method are equal to or better than those obtained from EPA-accepted methods, as well as those deemed equivalent by the LDEQ.

II.E.10. Retention of Records

The Permittee shall maintain records from all groundwater monitoring wells and associated groundwater surface elevations for the life of the corrective action at the PPG Industries Lake Charles Complex.

The Permittee shall maintain records through the active life of all RCRA facilities and the post-closure care period as required by LAC 33:V.309.J and LAC 33:V.1529.A, B, and C. All records, including plans, must be furnished upon request and made available at all reasonable times as required by LAC 33:V.1529.C. File copies shall be kept for LDEQ inspection for a period of not less than three years as required by LAC 33:V.317.B.

The Permittee shall, for the life of the permit, maintain records of all data used to complete the application for this permit and any supplemental information submitted under the Louisiana Hazardous Waste Control Law (La. R.S. 30:2171 et seq.).

II.E.11. Notices of Planned Physical Facility Changes

The Permittee shall give notice to the Administrative Authority, as soon as possible, of any planned physical alterations or additions to the permitted facility, in accordance with LAC 33:V.309.L.1.

II.E.12. Physical Facility after Modification

For a closed unit being modified, the Permittee may not manage hazardous waste in the modified portion of the closed unit until:

II.E.12.a. the Permittee has submitted to and received approval from the Administrative Authority, by certified mail or hand delivery, a letter signed by the Permittee and an independent registered professional engineer stating that the unit is complete and has been constructed or modified in compliance with the permit; and

II.E.12.b. the Administrative Authority has inspected the modified unit following a request to make final inspection by the Permittee and finds it is in compliance with the conditions of the permit and all applicable sections of LAC 33:V.Subpart 1, and has issued an Order to Proceed. The Permittee may then commence treatment, storage, or disposal of hazardous waste.

II.E.13. Anticipated Noncompliance

The Permittee shall give advance notice to the Administrative Authority of any planned changes in the permitted facility or activity that may result in noncompliance with permit requirements.

II.E.14. Transfer of Permits

This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to LAC 33:V.309.L.4, 321.B, 1531.D and LAC 33:I.Chapter 19.

The Permittee's failure to notify the new owner or operator of the requirements of LAC 33:V.Subpart 1 and LAC 33:I.Chapter 19 in no way relieves the new owner or operator of his obligation to comply with all applicable requirements.

Changes in the ownership or operational control of a facility shall be made with written notification to the Office of Environmental Services. The new owner or operator shall submit a Name/Ownership/Operator Change Form (NOC-1 Form) prior to or no later than forty-five (45) days after the change. The Administrative Authority may initiate action to terminate or revoke an existing media permit for failure to disclose a change of ownership or operational control within forty-five (45) days after the change, in

accordance with LAC 33:I.1909.B. The previous Permittee and the new Permittee must comply with all applicable requirements of LAC 33:I.1909.

II.E.15. Compliance Schedules

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than fourteen (14) days following each schedule date as required by LAC 33:V.309.L.6.

II.E.16. Emergency Unauthorized Discharge Notification

In accordance with LAC 33:I.3915, in the event of an unauthorized discharge that results in an emergency condition (an emergency condition is any condition which could be reasonably expected to endanger the health and safety of the public, cause significant adverse impact to the land, water, or air environment, or cause severe damage to property), the Permittee shall notify the DPS (Department of Public Safety) 24-hour Louisiana Emergency Hazardous Materials Hotline by telephone at (225) 925-6595 immediately, but in no case later than one (1) hour after learning of the discharge. The DPS 24-hour Louisiana Emergency Hazardous Materials Hotline will subsequently notify the Department regarding the details of the discharge.

II.E.17. Non-Emergency Unauthorized Discharge Notification

In accordance with LAC 33:I.3917, in the event of an unauthorized discharge that exceeds a reportable quantity specified in LAC 33:I.Chapter 39.Subchapter E and/or results in contamination of the groundwaters of the state but does not result in an emergency condition, the Permittee shall promptly notify the Department within twenty-four (24) hours after learning of the discharge. Notification shall be made to the Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC) in accordance with the procedure and content requirements specified in LAC 33:I.3923.

II.E.18. Unauthorized Discharge to Groundwater Notification

In accordance with LAC 33:I.3919, in the event of an unauthorized discharge resulting in contamination of groundwaters of the state by moving in, into, within or on any saturated subsurface strata, the Permittee shall notify the Office of Environmental Compliance, Emergency and Radiological Services Division, SPOC within seven (7) days after learning of the discharge.

II.E.19. Written Notification Reports for Unauthorized Discharges

The Permittee shall submit written reports for any unauthorized discharge that requires notification, under Conditions II.E.16, II.E.17 and II.E.18 of this permit, to the SPOC

within seven (7) calendar days after notification required by Conditions II.16 through II.18, in accordance with LAC 33:I.3925.

II.E.20. Noncompliance Reporting

The Permittee shall report orally within twenty-four (24) hours any noncompliance with the permit not reported under Condition II.E.16, Condition II.E.17 and Condition II.E.18 for confirmed releases to the groundwater that may endanger the human health or the environment in accordance with LAC 33:V.309.L.7. This report shall include at minimum the following information:

II.E.20.a. information concerning the release of any hazardous waste that may endanger public drinking water supplies; and

II.E.20.b. information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, that could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

II.E.20.b.(1) name, address, and telephone number of the owner or operator;

II.E.20.b.(2) name, address, and telephone number of the facility;

II.E.20.b.(3) date, time, and type of incident;

II.E.20.b.(4) name and quantity of materials involved;

II.E.20.b.(5) the extent of injuries, if any;

II.E.20.b.(6) an assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and

II.E.20.b.(7) estimated quantity and disposition of recovered material that resulted from the incident.

II.E.21. Follow-up Written Report of Noncompliance

The Permittee shall provide a written submission within five (5) days after the time the Permittee becomes aware of any noncompliance which may endanger human health or the environment not reported under Condition II.E.20 of this permit. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or

planned to reduce, eliminate, and prevent recurrence of the noncompliance. If the Administrative Authority waives the requirement, then the Permittee must submit a written report within fifteen (15) days after the time the Permittee becomes aware of the circumstances, as required by LAC 33:V.309.L.7.

II.E.22. Other Noncompliance

The Permittee shall report all instances of noncompliance not reported under Conditions II.E.11, II.E.13, II.E.15, and II.E.20, at the time required monitoring reports are submitted. The reports shall contain the information listed in Conditions II.E.11 and II.E.20, as required by LAC 33:V.309.L.11.

II.E.23. Other Information

Whenever the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or that it submitted incorrect information in a permit application, or in any report to the Administrative Authority, the Permittee shall promptly submit such facts or information as required by LAC 33:V.309.L.12.

II.E.24. Signatory Requirement

All applications, reports or other information requested by the Administrative Authority shall be signed and certified according to LAC 33:V.507, 509, 511, and 513.

II.E.25. Schedule of Compliance

II.E.25.a. Within 180 days of the effective date of this permit, the Permittee must provide financial assurance for the latest approved cost estimate for the site-wide corrective action at the PPG Industries Lake Charles Complex.

II.E.25.b. The Permittee must adhere to the Implementation Schedule in Attachment 4 of this permit.

II.E.26. Additional Operating Standards

(RESERVED)

II.E.27. Updated Documents to Be Submitted Prior to Operation

(RESERVED)

II.E.28. Documents to Be Maintained at Facility Site

II.E.28.a. Until post-closure is completed and certified by an independent registered professional engineer, the Permittee shall maintain at the facility the

following documents and any amendments, revisions, and modifications to these documents. Any revision or changes shall be submitted with the annual report unless previously submitted.

II.E.28.a.(1) (Reserved) A waste analysis plan is not required for the unit in post-closure under this permit.

II.E.28.a.(2) Personnel Training Plan and training records as required by LAC 33:V.1515 (see Attachment 1).

II.E.28.a.(3) Security Plan submitted in accordance with LAC 33:V.1507 and 1513 (see Attachment 1).

II.E.28.a.(4) Contingency Plan submitted in accordance with LAC 33:V.1513.

II.E.28.a.(5) Arrangements with the local authorities in accordance with LAC 33:V.1511.G (see Attachment 1).

II.E.28.a.(6) Post-Closure and Corrective Measures Plans submitted in accordance with LAC 33:V.3523 and approved by the Administrative Authority, as well as any post-closure care requirements that may be required initially or through permit modifications in accordance with LAC 33:V.3523 (see Attachment 1). The Post-Closure Plan addresses the corrective action and final remedy at the Wastewater Treatment Unit including the applicable sampling and analysis requirements.

II.E.28.a.(7) Cost estimates for facility post-closure care and corrective action submitted in accordance with LAC 33:V.3709 and 3301.B respectively and approved by the Administrative Authority, as well as any revised cost estimates that may be required initially or through permit modifications in accordance with LAC 33:V.3709.

II.E.28.a.(8) Operating records in accordance with LAC 33:V.1529. In particular, the Permittee must maintain records for permitted corrective action activities as required by LAC 33:V.1529.B.9.

II.E.28.a.(9) Inspection Schedule developed in accordance with LAC 33:V.517.G and 1509.B and approved by the Administrative Authority (see Attachment 1).

II.E.28.a.(10) A list of all active and inactive wells, and the locations of these wells, at the Lake Charles Complex.

II.E.28.a.(11) The most recent, updated sampling and analysis plan approved by the Administrative Authority and required by the Implementation Schedule contained in Attachment 4. The sampling and analysis plan must include a requirement that the Administrative Authority be notified of any sampling required by the sampling and analysis plan at least seven (7) days before the sampling event.

II.E.28.b. All proposed amendments, revisions and modifications to any plan or cost estimates required by this permit shall be submitted to the Administrative Authority for approval.

II.E.29. Annual Report

An annual report shall be submitted covering all hazardous waste units and their activities during the previous calendar year as required by LAC 33:V.1529.D.

An additional report addressing corrective action activities from the previous year shall be submitted to the Administrative Authority on October 1st of each year as required by LAC 33:V.1529.E.3. At a minimum, the Permittee will include in the report the information contained in Attachment 3 of the permit.

II.E.30. Manifest

The Permittee shall report manifest discrepancies and un-manifested waste as required by LAC 33:V.309.L.8 and 9.

II.E.31. Emissions

Emissions from any hazardous waste facility shall not violate the Louisiana Air Quality Regulations. If air quality standards are exceeded, the site will follow air regulation protocol.

II.E.32. Water Discharges

Water discharges, if any, must be in conformity with effluent limitations established by the Clean Water Act operating under a National Pollutant Discharge Elimination Systems (NPDES) permit and reported as required by that permit in accordance with LAC 33:V.1505.A.1.

II.E.33. Non-Listed Hazardous Waste Facilities

If the Permittee determines that an unpermitted hazardous waste facility exists, the Permittee must immediately notify the Administrative Authority in accordance with Condition II.E.23 of this Permit.

II.E.34. Compliance with Land Disposal Restrictions

The Permittee shall comply with those land disposal restrictions set forth in La. R.S. 30:2193 and all regulations promulgated thereunder.

II.E.35. Establishing Permit Conditions

Permits for facilities with pre-existing groundwater contamination are subject to all limits, conditions, remediation and corrective action programs designated under LAC 33:V.311.D and LAC 33:V.3303. Under LAC 33:V.3301.G.1, the management of the groundwater contamination at the Wastewater Treatment Unit may be integrated with the management of corrective action issues for the entire PPG Industries Lake Charles Complex under LAC 33:V.3322.

II.E.36. Obligation for Corrective Action

Owners or operators of hazardous waste management units must have all necessary permits during the active life of the unit and for any period necessary to comply with the corrective action requirements in Condition VIII of this permit. The facility is obligated to complete facility-wide corrective action regardless of the operational status of the facility.

II.E.37. Attachments and Documents Incorporated by Reference

All attachments and documents required by this permit, including all plans and schedules, are incorporated, upon approval by the Administrative Authority, into this permit by reference and become an enforceable part of this permit. When applicable, the Permittee must modify the permit according to LAC 33:V.Chapter 3. Since required items are essential elements of this permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject the Permittee to enforcement action, which may include fines, suspension, or revocation of the permit. Also, where applicable, the Permittee must meet all the permit modification requirements contained in LAC 33:V.321, 322, and 323.

Any noncompliance with approved plans and schedules shall be termed noncompliance with this permit. Written requests for extension of due dates for submittals may be granted by the Administrative Authority.

If the Administrative Authority determines that actions beyond those provided for, or changes to what is stated herein, are warranted, the Administrative Authority may modify this permit according to procedures in LAC 33:V.321.

III. GENERAL FACILITY CONDITIONS

III.A. DESIGN AND OPERATION OF THE POST-CLOSURE UNIT

The Permittee must maintain and operate all facilities to minimize the possibility of a fire, explosion, or any unauthorized sudden or non-sudden release of hazardous waste constituents to air, soil, or water that could threaten human health or the environment.

III.B. REQUIRED NOTICE

(RESERVED)

III.C. GENERAL WASTE ANALYSIS

(RESERVED)

III.D. SECURITY

The Permittee must comply with the security provisions of LAC 33:V.1507 and Attachment 1.

III.E. GENERAL INSPECTION REQUIREMENTS

The Permittee must follow the Inspection Plan referenced in Condition II.E.28.a.(9) and Attachment 1. The Permittee must remedy any deterioration or malfunction discovered by an inspection as required by LAC 33:V.1509.C. Records of inspections must be kept as required by LAC 33:V.1509.D. The inspection schedule must include the regulatory requirements of LAC 33:V.1509.A and B.

III.F. PERSONNEL TRAINING

The Permittee must conduct personnel training as required by LAC 33:V.1515.A, B, and C. The Permittee shall follow the approved Personnel Training Plan referenced in Attachment 1. The Permittee shall maintain all training documents and records as required by LAC 33:V.1515.D and E.

III.G. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

The Permittee must take precautions as required by LAC 33:V.1517 to prevent accidental ignition or reaction of ignitable or reactive wastes.

III.H. LOCATION STANDARDS

III.H.1. The Permittee has furnished evidence that it is in compliance with seismic standards as required by LAC 33:V.517.T.

III.H.2. The Permittee must not manage any hazardous waste on any portion of the property that lies within the 100 year flood plain (as identified in the Flood Insurance Rating Map) unless such areas are raised above this flood level or other means (e.g., levees) are provided to protect such areas from washouts, overtopping by wave action, soil erosion or other effects of such a flood as required by LAC 33:V.1503.B.3. Such site improvements must be certified by independent licensed professional engineers and approved by LDEQ prior to any hazardous waste and/or hazardous waste units being placed thereon.

III.I. PRECIPITATION RUN-ON AND RUN-OFF

The Permittee must be able to manage run-on and run-off resulting from the maximum rainfall in twenty-four (24) hours from a 25-year storm in accordance with LAC 33:V.1503.B.2.

III.J. HURRICANE EVENTS

The Permittee must initiate those applicable portions of the Contingency Plan during a hurricane as well as appropriate actions required by LAC 33:V.1507, 1509 and 1511.

III.K. PREPAREDNESS AND PREVENTION

III.K.1. Required Equipment

At a minimum, the Permittee must install and maintain the equipment set forth in the Contingency Plan, as required by LAC 33:V.1511.C.

III.K.2. Testing and Maintenance of Equipment

The Permittee must test and maintain the equipment specified in Condition III.K.1 to insure its proper operation in time of emergency. The testing and maintenance of the equipment must be documented in the operating record.

III.K.3. Access to Communications or Alarm Systems

The Permittee must maintain access to the communications or alarm system as required by LAC 33:V.1511.E.1 and 1511.E.2.

III.K.4. Arrangements with Local Authorities

The Permittee shall document in the annual report that the requirements of LAC 33:V.1511.G have been met. This documentation shall include those state and local agencies involved and those facilities and operations covered. Documentation of written arrangements with state and local agencies shall also be included in this report. Where state or local authorities decline to enter into such arrangements, the Permittee must document the refusal in the operating record.

III.L. CONTINGENCY PLAN

The Permittee must adhere to the contingency plan requirements of PPG Industries' RCRA operating permit, LAD008080506-OP-RN-1.

III.L.1. Implementation of Plan

The Permittee must immediately carry out the provisions of the approved Contingency Plan and follow the emergency procedures described by LAC 33:V.1513.F whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that threaten or could threaten human health or the environment.

III.L.2. Copies of Plan

The Permittee must comply with the requirements of LAC 33:V.1513.C.

III.L.3. Amendments to Plan

The Permittee must review and immediately amend, if necessary, the Contingency Plan as required by LAC 33:V.1513.D.

III.L.4. Emergency Coordinator

The Permittee must comply with the requirements of LAC 33:V.1513.E concerning the emergency coordinator.

III.M. MANIFEST SYSTEM

The Permittee shall comply with the manifest requirements of LAC 33:V.Chapter 11.

III.N. RECORD KEEPING AND REPORTING

III.N.1. Operating Record

The Permittee shall maintain a written operating record at the facility in accordance with LAC 33:V.1529.

III.N.2. Annual Report

The Permittee must comply with the annual report requirements of LAC 33:V.1529.D.

III.O. POST-CLOSURE/CORRECTIVE ACTION

III.O.1. Post-Closure/Corrective Action Care

The Permittee must manage the Wastewater Treatment Unit and site-wide corrective action in accordance with this permit.

III.O.2. Amendment to Permit

The Permittee must request modification of this permit when necessary, in accordance with LAC 33:V.3523.D and LAC 33:V.321.

III.O.3. Post-Closure/Corrective Action Restrictions

The Administrative Authority may require, at partial and final closure of the Lake Charles Complex, continuation of any of the security requirements of LAC 33:V.1507, during part or all of the post-closure care period when access by the public or domestic livestock may pose a hazard to human health.

III.O.4. Post-Closure/Corrective Action Property or Site Use

III.O.4.a. Use of property on or in which hazardous wastes or hazardous waste constituents remain after partial or final closure must never be allowed to interfere with the corrective action objectives and remedies listed in Attachment 2, unless the Administrative Authority finds that the interference:

III.O.4.a.(1) is necessary to the proposed use of the property, and will not increase the potential hazard to human health or the environment; or

III.O.4.a.(2) is necessary to reduce a threat to human health or the environment.

III.O.4.b. Any post-closure or corrective action activity other than that specified in this permit must have prior approval of the Administrative Authority.

III.O.5. Post-Closure/Corrective Action Contact

The Permittee must provide the name, address, and phone number of the person or office to contact about the permitted post-closure units and the site-wide corrective action during the term of this permit.

III.O.6. Certification of Completion of Post-Closure Care

No later than sixty (60) days after completion of the established post-closure care period for the specified unit, the Permittee must submit to the Administrative Authority, by

registered mail, a certification that the post-closure care period for the hazardous waste disposal unit(s) was performed in accordance with the specifications in the approved post-closure plan. The certification must be signed by the Permittee and an independent registered professional engineer. Within sixty (60) days after receipt of the certification the Administrative Authority will notify the owner or operator that he is no longer required to maintain financial assurance for post-closure care of that unit, unless the Administrative Authority has reason to believe that post-closure care was not conducted in accordance with the approved post-closure plan.

The certification of post-closure care shall include the certification statement found in the LAC 33:V.513.A or the current certification statement in the Louisiana hazardous waste regulations at the time of completion of post-closure care.

III.P. COST ESTIMATES FOR POST-CLOSURE CARE AND CORRECTIVE ACTION

III.P.1. The post-closure cost estimate requirements for the closed Wastewater Treatment Unit are included in the corrective action cost estimate requirements in accordance with conditions in this permit. The Permittee must maintain financial assurance for the corrective action as required by LAC 33:V.3322.B. Thus, the Permittee is required to maintain cost estimates as described in this Condition.

III.P.2. The Permittee must maintain cost estimates for the post-closure care and for the corrective action objectives and associated structures in accordance with LAC 33:V.3709, 3301.B and 3322.B.

III.P.3. The Permittee must maintain and adjust cost estimate(s) for inflation, as described in LAC 33:V.3709.B, C, D, and for other circumstances that increase the cost of post-closure and/or implementation and maintenance of the corrective action objectives and remedies.

III.P.4. The Permittee must base all post-closure and corrective action cost estimates on the assumption that a third party contractor will perform post-closure care and corrective action activities in accordance with LAC 33:V.3709.A.

III.P.5. During the life of the facility, the Permittee must keep, at the facility, its latest approved post-closure and corrective action cost estimates, as necessary, to comply with LAC 33:V.3709.D, 3301.B and 3322.B.

III.P.6. Post-closure care and corrective action cost estimates are submitted for a thirty (30) year period. These cost estimates must be maintained on a thirty (30) year rolling basis.

III.Q. FINANCIAL ASSURANCE FOR POST-CLOSURE CARE AND CORRECTIVE ACTION

III.Q.1. The Permittee must maintain and update its financial assurance mechanism(s), as necessary, to comply with the provisions of LAC 33:V.3711 throughout the post-closure care period.

III.Q.2. The Permittee must maintain and update its financial assurance mechanism(s), as necessary, to cover costs associated with corrective action at the PPG Lake Charles Complex until the completion of the associated corrective action.

III.Q.3. The initial financial assurance mechanism for corrective action or any subsequent change of the financial assurance mechanism must receive approval from the Administrative Authority.

III.R. LIABILITY REQUIREMENTS

(RESERVED)

III.S. INCAPACITY OF THE PERMITTEE

III.S.1. Pursuant to LAC 33:V.3717.A, the Permittee, and any guarantor of a corporate guarantee specified in LAC 33:V.3707.F and 3711.F, must immediately notify the Office of Environmental Services by certified mail of the commencement of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U.S. Code, naming the Permittee or guarantor as debtor, within 10 days after commencement of the proceeding.

III.S.2. Any Permittee who fulfills the requirements of LAC 33:V.3707. 3711 or 3715 by obtaining a trust fund, surety bond, letter of credit, or insurance policy will be deemed to be without the required financial assurance or liability coverage in the event of bankruptcy of the trustee or issuing institution, or a suspension or revocation of the authority of the trustee institution to act as trustee or of the institution issuing the surety bond, letter of credit, or insurance policy to issue such instruments. The Permittee must establish other financial assurance or liability coverage within 60 days after such an event.

III.S.3. Conditions III.S.1 and III.S.2 shall apply to financial assurance required by LAC 33:V.3322.B and C.

III.T. POST-CLOSURE NOTICES

If the Permittee or any subsequent Permittee of the land upon which this hazardous waste disposal unit is located wishes to remove hazardous wastes and hazardous waste residues, the liner or contaminated soils, he must request a modification to the post-closure permit in accordance with the applicable requirements in LAC 33:V. Chapters 3 and 7. The Permittee must demonstrate that the removal of hazardous wastes will satisfy the criteria of LAC 33:V.3521. By

removing hazardous waste, the Permittee may become a generator of hazardous waste and must manage it in accordance with all applicable requirements of LAC 33:V. Subpart 1. If he is granted a permit modification or otherwise granted approval to conduct such removal activities, the Permittee may request that the Administrative Authority approve either:

III.T.1. the removal of the notation on the deed to the facility property or other instrument normally examined during title search; or

III.T.2. the addition of a notation to the deed or instrument indicating the removal of the hazardous waste.

IV. PERMITTED CLOSED UNITS

This permit is applicable to the corrective action implemented at the PPG Industries Lake Charles Complex including corrective action associated with the Wastewater Treatment Unit. As per LAC 33:V.3301.G, the post-closure groundwater monitoring requirements for the closed surface impoundment are met by the corrective action conditions of LAC 33:V.3322.

TABLE 1
Post-Closure Care Unit

UNIT NAME	UNIT TYPE	CAPACITY
Wastewater Treatment Unit	Surface Impoundment	Not Applicable

V. PERMIT CONDITIONS APPLICABLE TO PERMITTED CLOSED UNITS

V.A. POST-CLOSURE CARE PERIOD

The post-closure care period will be in effect for the period of thirty (30) years, unless extended or shortened by the Administrative Authority, as specified in LAC 33:V.3521.A.1 and 2.

V.A.1 Wastewater Treatment Unit: Certification of closure was completed on July 24, 1996. Thus, the thirty (30) year post-closure requirement began on July 24, 1996.

V.B. POST-CLOSURE/CORRECTIVE ACTION MAINTENANCE

After final closure, the owner or operator must comply with all post-closure requirements contained in Condition III.O of this permit, including maintenance and monitoring throughout the post-closure care period specified in the permit under Condition V.A. The owner or operator must include in the annual report a post-closure/corrective action activity report for the Wastewater Treatment Unit and corrective action at the Lake Charles Complex.

V.C. POST-CLOSURE RESTRICTIONS

The Administrative Authority may require, at partial and final closure, continuation of any of the security requirements of LAC 33:V.1507, during part or all of the post-closure period when access by the public or domestic livestock may pose a hazard to human health.

V.D. POST-CLOSURE USE OF PROPERTY

V.D.1. Post-closure use of property on or in which hazardous wastes remain after partial or final closure must never be allowed to disturb the final cover, liner(s), or any other components of the containment system, or the function of the permitted closed unit's monitoring systems, unless the Administrative Authority find that the disturbance:

V.D.1.a. is necessary to the proposed use of the property and will not increase the potential hazard to human health or the environment; or

V.D.1.b. is necessary to reduce a threat to human health or the environment.

V.D.2. Any post-closure activity other than that specified in this permit must have prior approval of the Administrative Authority.

VI. GROUNDWATER PROTECTION

VI.A. APPLICABILITY

The regulations of LAC 33:V, Chapters 3, 5, 15, 29, 33, 35, and 37, and Louisiana Hazardous Waste Control Law, Revised Statute R.S., 30:2171 of the Environmental Quality Act, R.S., 30:2001 et seq., and the provisions of this condition shall apply to groundwater protection programs at the units identified in Condition IV, Table 1 of this permit. All requirements of this condition must be satisfied and shall apply until the Administrative Authority has accepted the certification of completion of post-closure care required by regulation and under Condition III.O.6 of this permit. This includes compliance, closure, and post closure care periods. The units referenced in Condition IV, Table 1 of the permit are subject to post-closure groundwater monitoring.

If groundwater contamination is confirmed as a result of operations related to past or present hazardous waste management facilities associated with this site, the Permittee shall establish, expand or continue, assessment and corrective action programs in accordance with the requirements of LAC 33:V.Chapter 33 and as subsequently directed by the Administrative Authority.

VI.B. REQUIRED PROGRAMS

(Reserved per Section VI.C.)

VI.C. ALTERNATIVE MONITORING REQUIREMENTS

Pursuant to LAC 33:V.3301.G., the Administrative Authority has determined that:

- (1) the former Wastewater Treatment Unit is situated among solid waste management units or areas of concern, a release has occurred, and both the regulated units and one or more solid waste management unit(s) or area of concern are likely to have contributed to the release; and
- (2) it is not necessary to apply the groundwater monitoring and corrective action requirements of LAC 33:V.Chapter 33 because alternative requirements developed under LAC 33:V.3322, will protect human health and the environment; and

- (3) in addition to the meeting the standards of LAC 33:V.3301.G, the former Wastewater Treatment Unit was closed by removal of all waste, liners and ancillary equipment.

Accordingly, the Administrative Authority will replace all or part of the requirements of LAC 33:V.Chapter 33, as applied to a regulated unit (i.e., LAC 33:V.3303 through 3321) with alternative requirements described in Condition VIII and the attachments to this permit. Attachment 2 details the corrective action objectives and associated remedy selections. Attachment 3 details the annual corrective action reporting requirements. Attachment 4 contains the implementation schedule for the activities required by the permit but have not yet been built or implemented at the time of issuance of the final permit. Attachment 5 contains the site wide analyte list, which is the list of compounds that the Permittee must monitor in accordance with the approved sampling and analysis plan. Attachment 6 contains the site specific HSWA requirements for the operating and maintenance of the corrective action at the Lake Charles Complex.

HAZARDOUS AND SOLID WASTE AMENDMENTS

VII. GENERAL CONDITIONS PURSUANT TO THE HAZARDOUS AND SOLID WASTE AMENDMENTS

VII.A. STANDARD CONDITIONS

VII.A.1. Waste Minimization

Annually, by March 1, for the previous year ending December 31, the Permittee shall enter into the operating record as required by LAC 33:V.1529.B.19, a statement certified according to LAC 33:V.513.A specifying that the Permittee has a program in place to reduce the volume and toxicity of hazardous wastes generated by the facility's operation to the degree determined by the Permittee to be economically practicable; and that the proposed method of treatment, storage, or practicable disposal method that is currently available to the Permittee minimizes the present and future threat to human health and the environment. A current description of the program shall be maintained in the operating record and a copy of the annual certified statement shall be submitted to the Administrative Authority. The following criteria should be considered for the program:

VII.A.1.a. Any written policy or statement that outlines goals, objectives, and/or methods for source reduction and recycling of hazardous waste at the facility;

VII.A.1.b. Any employee training or incentive programs designed to identify and implement source reduction and recycling opportunities;

VII.A.1.c. An itemized list of the dollar amounts of capital expenditures (plant and equipment) and operating costs devoted to source reduction and recycling of hazardous waste;

VII.A.1.d. Factors that have prevented implementation of source reduction and/or recycling;

VII.A.1.e. Sources of information on source reduction and/or recycling received at the facility (e.g., local government, trade associations, suppliers, etc.);

VII.A.1.f. An investigation of additional waste minimization efforts that could be implemented at the facility. This investigation would analyze the potential for reducing the quantity and toxicity of each waste stream through production reformulation, recycling, and all other appropriate means. The analysis would include an assessment of the technical feasibility, cost, and potential waste reduction for each option;

VII.A.1.g. A flow chart or matrix detailing all hazardous wastes the facility produces by quantity, type, and building/area;

VII.A.1.h. A demonstration of the need to use those processes that produce a particular hazardous waste due to a lack of alternative processes or available technology that would produce less hazardous waste;

VII.A.1.i. A description of the waste minimization methodology employed for each related process at the facility. The description should show whether source reduction or recycling is being employed;

VII.A.1.j. A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years; and

VII.A.1.k. The Permittee may meet the requirements for waste minimization by developing an Environmental Management System according to the EPA document, Integrated Environmental Management System Implementation Guide, EPA 744-R-00-011, October 2000, found on the EPA website at www.epa.gov/opptintr/dfe/pubs/iems/iems_guide/index.htm.

VII.A.2. Dust Suppression

Pursuant to LAC 33:V.4139.B.4, and the Toxic Substances Control Act, the Permittee shall not use waste or used oil or any other material which is contaminated with dioxin, polychlorinated biphenyls (PCBs), or any other hazardous waste (other than a waste identified solely on the basis of ignitability), for dust suppression or road treatment.

VII.A.3. Failure to Disclose

The Permittee's failure in the application or during the permit issuance process to disclose fully all relevant facts at any time may be cause for termination or modification of this Permit in accordance with LAC 33:V.323.B.2 and 3.

VII.A.4. Suspension, Modification, or Revocation and Reissuance, and Termination of Permit

This Permit may be modified, revoked and reissued, or terminated for cause as specified in LAC 33:V.323. The filing of a request by the Permittee for a permit modification, revocation and reissuance, termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay the applicability or enforceability of any permit condition.

VII.A.4.a. If the Administrative Authority tentatively decides to modify or revoke and reissue a permit under LAC 33:V.321.C. or 323, a draft permit shall be prepared incorporating the proposed changes. The Administrative Authority may request additional information and, in the case of a modified permit, may require the submission of an updated permit application.

VII.A.4.b. The Permittee may initiate permit modification proceedings under LAC 33:V.321.C. All applicable requirements and procedures as specified in LAC 33:V.321.C shall be followed.

VII.A.4.c. Modifications of this Permit do not constitute a reissuance of the Permit.

VII.A.5. Permit Review

This Permit may be reviewed by the Administrative Authority five years after the date of permit issuance and may be modified as necessary as provided for in LAC 33:V.321.C. Nothing in this section shall preclude the Administrative Authority from reviewing and modifying the Permit at any time during its term.

VII.A.6. Compliance with Permit

Compliance with a RCRA permit during its term constitutes compliance, for purposes of enforcement, with subtitle C of RCRA except for those requirements not included in the permit which:

VII.A.6.a. Become effective by statute;

VII.A.6.b. Are promulgated under LAC 33:V.Chapter 22 restricting the placement of hazardous wastes in or on the land; or

VII.A.6.c. Are promulgated under LAC 33:V.Chapters 23, 25 and 29 regarding leak detection systems for new and replacement surface impoundment, waste pile, and landfill units, and lateral expansions of surface impoundment, waste pile, and landfill units. The leak detection system requirements include double liners, construction quality assurance (CQA) programs, monitoring action leakage rates, and response action plans, and will be implemented through the procedures of LAC 33:V.321.C Class 1 permit modifications.

VII.A.7. Specific Waste Ban

VII.A.7.a. The Permittee shall not place in any land disposal unit the wastes specified in LAC 33:V. Chapter 22 after the effective date of the prohibition unless the Administrative Authority has established disposal or treatment standards for the hazardous waste and the Permittee meets such standards and other applicable conditions of this Permit.

VII.A.7.b. The Permittee may store wastes restricted under LAC 33:V.Chapter 22 solely for the purpose of accumulating quantities necessary to facilitate proper recovery, treatment, or disposal provided that it meets the requirements of LAC 33:V.2205 including, but not limited to, clearly marking each tank or container.

VII.A.7.c. The Permittee is required to comply with all applicable requirements of LAC 33:V.2245 as amended. Changes to the Waste Analysis Plan will be considered permit modifications at the request of the Permittee, pursuant to LAC 33:V.321.C.

VII.A.7.d. The Permittee shall review the waste analysis plan and analyze the waste when a process changes to determine whether the waste meets applicable treatment standards. Results shall be maintained in the operating record pursuant to Condition III.C.1 and 2.

VII.A.8. Information Submittal for the Corrective Action Strategy

Failure to comply with any condition of the Permit, including information submittals, constitutes a violation of the Permit and is grounds for enforcement action, permit amendment, termination, revocation, suspension, or denial of permit renewal application. Falsification of any submitted information is grounds for termination of this Permit (LAC 33:V.323.B.3).

The Permittee shall ensure that all plans, reports, notifications, and other submissions to the Administrative Authority required by this Permit using the Corrective Action Strategy are signed and certified in accordance with LAC 33:V.Chapter 5, Subchapter B. All submittals required under the corrective action strategy must conform to those requirements outlined in the RECAP, LAC 33:I.Ch.13 (see Condition VIII of this permit). Variance from content and/or formatting guidelines provided under the RECAP, LAC 33:I.Ch.13, shall be requested by the Permittee prior to submittal to the Administrative Authority, as deemed necessary. Approval or disapproval of such a request with further guidance on content and formatting will be provided by the Administrative Authority, as deemed necessary. Five (5) copies each of these plans, reports, notifications or other submissions and one (1) electronic copy (3.5" IBM compatible disk or CD-ROM) of all portions thereof which are in word processing format shall be submitted to the Administrative Authority by Certified Mail or hand delivered to:

**Louisiana Department of Environmental Quality
Office of Environmental Assessment
Remediation Services Division
P.O. Box 4314
Baton Rouge, LA 70821-4314**

VII.A.9. Data Retention

All raw data, such as laboratory reports, drilling logs, bench-scale or pilot-scale data, and other supporting information required by this Permit shall be maintained at the facility during the term of this Permit as required by the various recordkeeping requirements of LAC 33:V.Subpart 1, including any reissued Permits, unless

permission to no longer retain such data is granted by the Administrative Authority in writing.

VII.A.10. Management of Wastes

All solid wastes which are generated by a remedial measure taken under the corrective action process or as an interim measure required by this permit to address a release or the threat of a release of hazardous waste constituents from a Solid Waste Management Unit shall be managed in a manner protective of human health and the environment and in compliance with all applicable Federal, State and local requirements. The Permittee is required to comply with all applicable requirements of RECAP. Approval of units for managing wastes and conditions for operating the units shall be granted through the conditions of Condition VIII of this permit, including interim measures.

VII.B. EMISSION STANDARDS - PROCESS VENTS, EQUIPMENT LEAKS, TANKS, SURFACE IMPOUNDMENTS, AND CONTAINERS (AA-BB-CC AIR REGULATIONS)

(RESERVED)

VII.C. SPECIFIC CONDITION - CLOSURE

Pursuant to Section 3005(j)(1) of the Hazardous and Solid Waste Amendments of 1984, the Permittee shall close any closing units in accordance with the following provisions:

VII.C.1. Other than consolidation of any wastes from the sites in conformance with LAC 33:V.Chapter 22, Land Disposal Restrictions, the Permittee shall not place waste prohibited by LAC 33:V.Chapter 22 into any closing units;

VII.C.2. The Permittee shall perform unit closures in accordance with the Closure Plan(s) as approved at the time of closure, and which meet(s) all relevant State and Federal closure requirements at the time of closure; and

VII.C.3. The Permittee shall notify the Administrative Authority in writing at least sixty (60) days prior to commencement of closure.

VIII. SPECIAL CONDITIONS PURSUANT TO HAZARDOUS AND SOLID WASTE AMENDMENTS—CORRECTIVE ACTION STRATEGY

Corrective Action for Releases: Section 3004(u) of RCRA, as amended by the Hazardous and Solid Waste Amendments (HSWA), and LAC 33:V.3322 require that permits issued after November 8, 1984, address corrective action for releases of hazardous waste or hazardous constituents from any solid waste management unit at the facility, regardless of when the waste was placed in the unit.

EPA's traditional RCRA corrective action approach is structured around several elements common to most activities. In the first phase, RCRA facility assessment (RFA), EPA or the authorized state assesses the facility to identify releases and determine the need for corrective action. In the second phase, RCRA facility investigation (RFI), the facility conducts a more detailed investigation to determine the nature and extent of contaminants released to ground water, surface water, air, and soil. If remedial action is needed, a third phase, corrective measures study (CMS), is started. During this phase, the facility conducts a study, which when completed, describes the advantages, disadvantages, and costs of various cleanup options. After selection of a final remedy, the fourth phase, corrective measures implementation (CMI), is initiated. The facility is required to design, construct, operate, maintain, and monitor the final remedy(s).

The Corrective Action Strategy (CAS) is an alternative corrective action approach that can be implemented during any phase of corrective action for a release area. The Permittee shall use the CAS approach as the framework for corrective action to clarify, facilitate and expedite the process, and shall use the **Louisiana Department of Environmental Quality Risk Evaluation/Corrective Action Program (RECAP, LAC 33:I.Ch.13)** for screening and media-specific cleanup standards. EPA has interpreted the term "release" to mean, "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." (50 FR 2873, July 15, 1985). The CAS refers to "release areas" as solid waste management units (SWMUs) and areas of concern (AOCs) while the RECAP refers to release areas as areas of investigation (AOIs). SWMUs and AOCs may also be referred to as "AOIs" when investigated and managed under the RECAP, LAC 33:I.Ch.13.

As of the effective date of this renewal Permit, the Permittee has completed the investigatory requirements of the previously effective Wastewater Treatment Unit Permit, LAD008086506-PC-MO-1. The investigatory requirements leading to a corrective measure study are not required of the Permittee, unless new SWMUs and/or AOCs are discovered, or if other information is discovered that significantly alters the conceptual site model on which the remedies selected were based.

VIII.A. ALTERNATIVE CORRECTIVE ACTION

VIII.A.1. Introduction to CAS

This Permit will utilize the CAS Guidance Document ([www.epa.gov/Region 6/6pd/rcra_c/pd-o/riskman.htm](http://www.epa.gov/Region6/6pd/rcra_c/pd-o/riskman.htm)) developed by the U.S. Environmental Protection

Agency (EPA) Region 6 whenever the Administrative Authority determines that it will serve to facilitate the corrective action. The CAS Guidance Document shall be utilized to the fullest extent practicable for planning and implementation of the corrective action. The CAS in this Permit shall not supersede existing Federal, State, and local regulations. The two primary objectives are to prioritize corrective action at the facility, and streamline corrective action administrative procedures, resulting in the protection of human health and the environment.

The CAS is a performance-based approach; using data quality objectives, investigations begin with the endpoint in mind. The CAS is a risk management strategy that can be implemented during any phase of corrective action. However, the CAS need not be applied to work that has already been completed to the satisfaction of the Administrative Authority. Performance standards are established at the beginning of the corrective action process, allowing earlier and more focused implementation. Releases are screened using RECAP screening numbers to determine the priority of corrective action, and remedial alternatives are selected on the basis of their ability to achieve and maintain the established performance standards.

There is no one specific path through the CAS process. The CAS is a facility-wide approach, focusing corrective action on releases that pose the greatest risk first. Screening releases will also enable some areas of interest to qualify for no further action at this time (Condition VIII.A.3.a.), thus resources can be used to best benefit the protection of human health and the environment. The CAS process also considers activities previously conducted under the traditional corrective action process. Condition VIII.O of this permit contains a summary of corrective action activities completed to date and also describes where the Permittee is in the CAS process at the time of issuance of this permit. The applicability of various provisions of the CAS will depend on where the Permittee is in the CAS process as detailed in VIII.O.

The traditional RCRA corrective action process and reports (i.e., RFIs, CMSs, CMIs, etc.) are not elements of the CAS. However, the use of information and reports from the traditional corrective action process, if available, is encouraged, in addition to new site-specific information.

The Administrative Authority, through an agency-initiated permit modification, may remove the CAS as the means of facility-wide corrective action in the case of the failure of the Permittee to disclose information, abide by the terms and conditions of this permit, adhere to agreed schedules, or show adequate progress; or should an impasse occur between the Permittee and the Administrative Authority. The Administrative Authority will institute other means of corrective action (such as traditional corrective action) at the facility through modification of this permit.

VIII.A.2. Performance Standards

Expectations for the outcome of corrective action at a facility are established in the CAS by three performance standards as defined in Conditions VIII.A.2.a through c.

The Permittee's proposed performance standards shall be presented during the scoping meeting. The Permittee must justify the proposed performance standards through evaluation and documentation of land use, ground water designation (current and reasonably expected future use), types of receptors present, exposure pathways, etc.; as described in RECAP, Chapter 2. Through the application of the performance standards and RECAP, the Permittee and Administrative Authority shall determine whether a release must be addressed through corrective action, and whether implemented corrective actions are protective of human health and the environment. The Permittee shall submit the performance standards in writing along with the Conceptual Site Model (Condition VIII.D) within one-hundred and twenty (120) days after the scoping meeting. The Administrative Authority may either approve the performance standards proposed by the Permittee or establish performance standards that the Administrative Authority deems necessary to protect human health and the environment.

The three CAS performance standards are defined below. The order in which the performance standards are listed does not indicate that one performance standard takes priority over another. All applicable performance standards must be achieved by the Permittee.

VIII.A.2.a. Source Control Performance Standard

Source control refers to the control of materials that include or contain hazardous wastes or hazardous constituents that act as a reservoir for migration of contamination to soil, sediment, ground water, surface water, or air, or as a source for direct exposure.

The facility must determine if source material is present. Removal, containment, treatment, or a combination of the three, must be evaluated on a case-by-case basis. Controlling source material is a predominating issue in the CAS, and must be addressed to ensure protectiveness over time. Prioritization of the SWMUs and AOCs does not mean avoidance of controlling source materials.

VIII.A.2.b. Statutory and Regulatory Performance Standard

Applicable statutory and regulatory requirements (Federal, State, and local) must be identified. These requirements may dictate media-specific contaminant levels (e.g., maximum contaminant levels (MCLs) in drinking water) that must be achieved and may become a performance standard for the Permittee.

VIII.A.2.c. Final Risk Goal Performance Standard

The final risk goal is the level of protection to be achieved and maintained by the Permittee. The final risk goal shall be based on site-specific issues including land use, special subpopulations, contaminant concentrations based

on acceptable risk, location at which the levels are measured, and the remediation time frame, as specified by RECAP.

One final risk goal may apply to the entire facility, but it is more likely that different releases will require different final risk goals due to variations in location of releases, land use, proximity of receptors, etc. The final risk goal will be based on sound risk assessment methodologies (Condition VIII.A.3).

VIII.A.3. Use of RECAP

The latest edition of the RECAP document shall be used by the Permittee to determine the need for further corrective actions under this permit. The RECAP consists of a tiered framework comprised of a Screening Option (SO), and three Management Options (MO). The tiered management options allow site evaluation and corrective action efforts to be tailored to site conditions and risks. As the MO level increases, the approach becomes more site-specific and hence, the level of effort required to meet the objectives of the Option increases.

The RECAP shall be used by the Permittee to evaluate data quality and data usability (RECAP Section 2.4 and 2.5), to determine the identity of an AOI as described in RECAP Section 2.6, and for estimations of Area of Investigation Concentrations and Groundwater Compliance Concentrations for each media as defined in RECAP Section 2.8.

The RECAP shall be used by the Permittee to evaluate land use as described in RECAP Section 2.9, and groundwater/aquifer use as described in RECAP Section 2.10.

The RECAP shall be used by the Permittee to prioritize AOCs, SWMUs, and AOIs that require remediation so site investigations are focused on the release areas that pose the greatest risk. As the CSM is compiled, the Permittee shall assess historical data (RECAP Section 2.5) and use the following management options, as appropriate, to address each release site.

VIII.A.3.a. Screening Option

The Permittee shall use the Screening Standards (SS) which are LDEQ-derived screening numbers for soil and groundwater for non-industrial and industrial land use scenarios. The SS shall be used to demonstrate that an AOI does not pose a threat to human health and the environment and, hence does not require further action at this time (NFA-ATT) or that further evaluation is warranted under a higher Management Option.

VIII.A.3.b. Management Option 1

The Permittee shall use Management Option 1 (MO-1) which provides a RECAP standard (RS) derived for non-industrial and industrial exposure

scenarios using currently recommended default exposure parameters and toxicity values. Under MO-1, an AOI may warrant a NFA-ATT determination, or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-1 limiting RS, then the Permittee may; (1) remediate to the MO-1 limiting RS (and comply with closure/post closure requirements for MO-1), or (2) proceed with a MO-2 or MO-3 evaluation.

VIII.A.3.c. Management Option 2

The Permittee shall use Management Option 2 (MO-2) which provides for the development of soil and groundwater RS using site-specific data with specified analytical models to evaluate constituent fate and transport at the AOI. The results of this evaluation shall be used in conjunction with standard reasonable maximum exposure (RME) assumptions to identify site-specific MO-2 RS. Under MO-2, an AOI may warrant a NFA-ATT determination, or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-2 limiting RS, then the Permittee may; (1) remediate to the MO-2 limiting RS (and comply with closure/post closure requirements for MO-2), or (2) proceed with a MO-3 evaluation.

VIII.A.3.d. Management Option 3

The Permittee shall use Management Option 3 (MO-3) which provides the option of using site-specific data for the evaluation of exposure and the evaluation of environmental fate and transport at the AOI. The results of the site-specific evaluation may be to develop site-specific MO-3 RS. Under MO-3, an AOI may warrant a NFA-ATT determination, or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-3 limiting RS, then the Permittee shall; (1) remediate to the MO-3 RS, (2) conduct confirmatory sampling, and (3) comply with closure/post closure requirements for MO-3.

VIII.A.4. Corrective Action for Releases Beyond Facility Boundary

Section 3004(v) of RCRA as amended by HSWA, and State regulations promulgated as LAC 33:V.3322.C require corrective actions beyond the facility property boundary, where necessary to protect human health and the environment, unless the Permittee demonstrates that, despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where offsite access is denied.

VIII.A.5. Financial Responsibility

Assurances of financial responsibility for corrective action shall be provided by the Permittee as specified in the Permit following major modification for remedy selection. The Administrative Authority reserves the right to require financial

assurance prior to remedy selection based upon facility compliance history, the extent and degree of contamination, financial health of the Permittee, and input from the public.

VIII.A.6. Summary of Corrective Action Activities

A summary of the corrective action activities associated with the facility is provided in Condition VIII.O of this permit.

VIII.A.7. Approval of Alternative Schedule

In the event that conditions VIII.L and M are invoked, the Permittee may be required to modify the permit to include newly discovered releases or modify other permit conditions. The Permittee may submit a written request for an alternative schedule to the requirements of Conditions VIII.B through VIII.J of this permit. The request should propose a specific alternative schedule and include an explanation as to why the alternative schedule is necessary. The Administrative Authority will consider site-specific criteria in either approving or disapproving the request for an alternative schedule.

VIII.B. PROJECT DEVELOPMENT AND SCOPING MEETING

VIII.B.1. Notice of Intent

The Permittee must submit to the Administrative Authority a Notice of Intent to conduct corrective action using the CAS within sixty (60) days of the confirmation of a newly discovered release of hazardous waste or hazardous waste constituents from a SWMU or AOC, or the discovery of a new SWMU or AOC.

The notice of intent should state the following:

VIII.B.1.a. General information regarding facility location;

VIII.B.1.b. General information regarding the facility's operational history;

VIII.B.1.c. General discussion on how the Permittee will proceed through the CAS or a proposal for an alternative strategy including any applicable rationale or justification for an alternative strategy.

VIII.B.1.d. Brief description of proposed performance standards for corrective action; and

VIII.B.1.e. Propose a date for a scoping meeting between the Permittee and the Administrative Authority to be held within sixty (60) days of the date of the Notice of Intent.

VIII.B.2. Scoping Meeting

The scoping meeting will serve as the first CAS milestone where the Permittee and the Administrative Authority identify expectations concerning CAS implementation. The length and extent of the meeting will depend on the complexity of the site. Agreements on land use, groundwater classification, the level of detail required in the conceptual site model (see Condition VIII.D) and expectations for remediation goals will be discussed during the scoping meeting(s). During the scoping meeting the Permittee will present the following information to the Administrative Authority:

VIII.B.2.a. A conceptual site model (if one already has been developed);

VIII.B.2.b. Discussions on history of corrective action at the facility, including facility investigations, risk evaluations or risk assessments, interim measure/stabilizations and final remedies implemented;

VIII.B.2.c. Proposed performance standards for the facility with justification, and potential risk management approaches;

VIII.B.2.d. Discussions on how the Permittee plans to use the CAS to meet its corrective action obligations, including permitting and compliance issues;

VIII.B.2.e. A Communication Strategy Plan that specifies where in the CAS process the Permittee is currently and how the Permittee will provide information about future progress at the facility to the Administrative Authority (i.e., progress reports, conference calls, routine meetings, etc.);

VIII.B.2.f. Site-specific concerns (i.e., sensitive environments or special subpopulations);

VIII.B.2.g. Need for interim measures or stabilization activities, if necessary; and

VIII.B.2.h. Schedule for submittal of the CAS Investigation Workplan and proposed schedule for conducting and completing CAS requirements, including public participation.

Information plans and reports that have already been developed by the Permittee during the corrective action process can be referenced during the scoping meeting. The Permittee must coordinate with the Administrative Authority in order to determine the date, time, and location of the scoping meeting.

VIII.C. REPORTING REQUIREMENTS

VIII.C.1. The Permittee shall submit, in accordance with Condition VII.A.8, signed reports of all activities conducted pursuant to the provisions of this Permit as required by the Administrative Authority. The reporting schedule shall be determined on a

case-by-case basis by the Administrative Authority. These reports shall contain, as applicable to the stage of corrective action, the information required by CAS, as well as the following:

VIII.C.1.a. A description of the work completed and an estimate of the percentage of work completed;

VIII.C.1.b. Summaries of all findings, including summaries of laboratory data;

VIII.C.1.c. Summaries of all problems or potential problems encountered during the reporting period and actions taken to rectify problems;

VIII.C.1.d. Projected work for the next reporting period;

VIII.C.1.e. Summaries of contacts pertaining to corrective action or environmental matters with representatives of the local community, public interest groups or State government during the reporting period;

VIII.C.1.f. Changes in key project personnel during the reporting period; and

VIII.C.1.g. Summaries of all changes made in implementation during the reporting period.

VIII.C.2. Copies of other reports relating to or having bearing upon the corrective action work (e.g., inspection reports, drilling logs and laboratory data) shall be made available to the Administrative Authority upon request.

VIII.C.3. In addition to the written reports as required in Condition VIII.C.1 and VIII.C.2 above, at the request of the Administrative Authority, the Permittee shall provide status review through briefings with the Administrative Authority.

VIII.C.4. The determination and approval of remedy selections, schedules of submittals and minor changes to any corrective action workplans may be made by the Administrative Authority during the scoping meeting or status review briefings as described in Condition VIII.C.3.

VIII.D. SPECIFIC CONDITION – CONCEPTUAL SITE MODEL (CSM)

No later than 120 days after the scoping meeting, the Permittee shall submit to the Administrative Authority a CSM (along with the Performance Standards detailed in Condition VIII.A.2) or an update of any CSM submitted at the scoping meeting providing background information and the current conditions at the facility. The level of detail required for the CSM will be discussed during the scoping meeting. At a minimum, the CSM must address current site conditions, land use, known and/or potential constituent source(s), routes of constituent migration, exposure media (i.e., soil, surface waters, groundwater), exposure points, points of compliance and pathways, receptors and source media to be

evaluated under the RECAP. The CSM must include a completed Figure 8 (LAC 33:1.Chapter 13). The Permittee may include completed investigations, existing data, or previously submitted documents in the CSM by reference. References must include the names, dates, and brief summaries of the documents.

If a CSM has been previously developed, the scoping meeting will also provide the opportunity for the Permittee and Administrative Authority to consider and identify all data gaps in the CSM. The initial CSM shall be considered the "base document" to be prepared and updated by the facility as new information is gathered during investigations. The CSM shall be used by the facility to make decisions regarding risk management options, ecological risk, and monitored natural attenuation determinations (RECAP Section 2.16), or technical impracticability (TI) waiver determinations, when appropriate.

The Administrative Authority reserves the right to require revisions to the CSM based upon data resulting from ongoing investigations and activities. Revisions to the CSM may also be required for newly identified SWMUs or AOCs according to Condition VIII.L of this permit and based on new information and information not previously considered by the Administrative Authority.

The CSM shall be divided into Profiles as detailed in Conditions VIII.D.1 through 6. If the Permittee chooses to use existing data and documents in the CSM, it may not be necessary to prepare the Profiles as detailed in Conditions VIII.D.1 through 6. However, the existing documents and data must provide sufficient information and detail which corresponds to the information required by the Facility, Land Use and Exposure, Physical, Release, Ecological, and Risk Management Profiles.

VIII.D.1. Facility Profile

The Permittee shall include in the CSM a Facility Profile which shall summarize the regional location, pertinent boundary features, general facility structures, process areas, and locations of solid waste management units or other potential sources of contaminant migration from the routine and systematic releases of hazardous constituents to the environment (e.g., truck or railcar loading/unloading areas). The Permittee shall also include historical features that may be potential release areas because of past management practices. The Facility Profile shall include:

VIII.D.1.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V. Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.1.a.(1) General geographic location;

VIII.D.1.a.(2) Property lines with the owners of all adjacent property clearly indicated;

VIII.D.1.a.(3) Facility structures, process areas and maintenance areas;

VIII.D.1.a.(4) Any other potential release areas shall be delineated, such as railcar loading/unloading areas or any other AOI as described in RECAP Section 2.6; and

VIII.D.1.a.(5) Locations of historical features that may be potential release areas or any areas of past solid and hazardous waste generation, treatment, storage or disposal activities.

VIII.D.1.b. The Facility Profile shall also include a description of ownership and operation of the facility.

VIII.D.1.c. The Permittee shall provide pertinent information for those spills that have not been assessed and reported to the Administrative Authority during facility investigations, addressed by facility spill contingency plans, or previously remediated or deemed for no further action. The information must include at minimum, approximate dates or periods of past waste spills, identification of the materials spilled, the amount spilled, the location where spilled, and a description of the response actions conducted (local, state, federal, or private party response units), including any inspection reports or technical reports generated as a result of the response.

VIII.D.2. Land Use and Exposure Profile

The Permittee shall include in the CSM a Land Use and Exposure Profile which includes surrounding land uses (industrial and non-industrial, as described in RECAP Sections 2.9.1 and 2.9.2), resource use locations (water supply wells, surface water intakes, etc.), beneficial resource determinations (groundwater classifications as described in RECAP Section 2.10), natural resources (wetlands, etc.), sensitive subpopulation types and locations (schools, hospitals, nursing homes, day care centers, etc.), applicable exposure scenarios, and applicable exposure pathways identifying the specific sources, releases, migration mechanisms, exposure media, exposure routes and receptors. The Land Use and Exposure Profile shall include:

VIII.D.2.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.2.a.(1) Surrounding land uses, resource use locations, and natural resources/wetlands;

VIII.D.2.a.(2) Locations of sensitive subpopulations; and

VIII.D.2.a.(3) An exposure pathway flowchart which outlines sources, migration pathways, exposure media and potential receptors as depicted in Figure 8 (CMS example) of the RECAP.

VIII.D.3. Physical Profile

The Permittee shall include in the CSM a Physical Profile which shall describe the factors that may affect releases, fate and transport, and receptors, including; topography, surface water features, geology, and hydrogeology. The Physical Profile shall include:

VIII.D.3.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V.Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.3.a.(1) Topographic maps with a contour interval of five (5) or ten (10) feet, a scale of one inch to 100 feet (1:100), including hills, gradients, and surface vegetation or pavement;

VIII.D.3.a.(2) Surface water features including routes of all drainage ditches, waterways, direction of flow, and how they migrate to other surface water bodies such as canals and lakes;

VIII.D.3.a.(3) Regional geology including faulting and recharge areas, as well as local geology depicting surface features such as soil types, outcrops, faulting, and other surface features;

VIII.D.3.a.(4) Subsurface geology including stratigraphy, continuity (locations of facies changes, if known), faulting and other characteristics;

VIII.D.3.a.(5) Maps with hydrogeologic information identifying water-bearing zones, hydrologic parameters such as transmissivity, and conductivity. Also locations and thicknesses of aquitards or impermeable strata; and

VIII.D.3.a.(6) Locations of soil borings and production and groundwater monitoring wells, including well log information, and construction of cross-sections which correlate substrata. Wells shall be clearly labeled with ground and top of casing elevations (can be applied as an attachment).

VIII.D.4. Release Profile

The Permittee shall include in the CSM a Release Profile which shall describe the known extent of contaminants in the environment, including sources, contaminants of

concern (COC), areas of investigations, distribution and magnitude of known COCs with corresponding sampling locations, and results of fate and transport modeling depicting potential future extent/magnitude of COCs. The Release Profile shall include:

VIII.D.4.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V. Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.4.a.(1) Estimations of source concentrations, exposure concentrations and compliance concentrations for each affected media as defined in Section 2.8 of RECAP;

VIII.D.4.a.(2) Isopleth maps depicting lateral extent and concentrations of COCs;

VIII.D.4.a.(3) Results of fate and transport modeling showing potential exposure concentrations and locations; and

VIII.D.4.a.(4) Locations of potential sources including past or present waste units or disposal areas and all SWMUs/AOCs.

VIII.D.4.b. Table(s) depicting the following information for each SWMU/AOC, including but not limited to: location; type of unit/disposal/release area; design features; operating practices (past and present); period of operation; age of unit/disposal/release area; general physical condition; and method of closure.

VIII.D.4.c. Table(s) depicting the following waste/contaminant characteristics for those areas referenced in Condition VIII.D.4.b, including but not limited to: type of waste placed in the unit (hazardous classification, quantity, chemical composition), physical and chemical characteristics (physical form, description, temperature, pH, general chemical class, molecular weight, density, boiling point, viscosity, solubility in water, solubility in solvents, cohesiveness, vapor pressure); and migration and dispersal characteristics of the waste (sorption coefficients, biodegradability, photodegradation rates, hydrolysis rates, chemical transformations).

VIII.D.5. Ecological Profile

The Permittee shall include in the CSM an Ecological Profile that shall describe the physical relationship between the developed and undeveloped portions of the facility, the use and level of disturbance of the undeveloped property, and the type of ecological receptors present in relation to completed exposure pathways. When compiling data for the Ecological Profile, current, as well as, future impacts to

receptors and/or their habitats shall be considered. The Ecological Profile shall include:

VIII.D.5.a. A history and description of the developed property on the facility, including structures, process areas, waste management units, and property boundaries;

VIII.D.5.b. A history and description of the undeveloped property, including habitat type (wetland, grassy area, forest, ponds, etc.). Include a description of the primary use, degree and nature of any disturbance, along with proximity to drainage ditches, waterways and landfill areas;

VIII.D.5.c. A description of the site receptors in relation to habitat type, including endangered or protected species, mammals, birds, fish, etc.;

VIII.D.5.d. A description of the relationship between release areas and habitat areas, specifically relating chemicals of potential ecological concern (COEC) to ecological receptors;

VIII.D.5.e. An ecological checklist as described in Section 7.0 of RECAP. An ecological checklist (presented in Appendix C, Form 18 of the RECAP) shall be used to determine if a tier 1 (screening level) Ecological Risk Assessment (ERA) is warranted.

VIII.D.6. Risk Management Profile

The Permittee shall include in the CSM a Risk Management Profile that shall describe how each AOI at the facility will be managed for the protection of human health and the environment. The Risk Management Profile will serve as documentation of the results of the site ranking system (described in Section 2.2 of RECAP). The Risk Management Profile will also document the criteria and verify that the SO, MO-1, MO-2 or MO-3 is appropriate for application at each AOI. The Risk Management Profile shall include:

VIII.D.6.a. A table for tracking the management options for each AOI, and the determination made, whether an AOI is deemed for no further action at this time (NFA-ATT) or is going to use either the SO, MO-1, MO-2 or MO-3 management option.

VIII.D.6.b. A list of identified site-wide data gaps for further investigation.

VIII.D.6.c. Documentation of all interim measures which have been or are being undertaken at the facility, including under State or Federal compliance orders, other than those specified in the Permit. This documentation shall include the objectives of the interim measures and how the measure is mitigating a potential threat to human health or the environment and/or is

consistent with and integrated into requirements for a long term remedial solution.

VIII.E. INTERIM MEASURES

VIII.E.1. If at any time during the term of this Permit, the Administrative Authority determines that a release or potential release of hazardous constituents from a SWMU/AOC poses a threat to human health and the environment, the Administrative Authority may require interim measures. The Administrative Authority shall determine the specific measure(s) or require the Permittee to propose a measure(s). The interim measure(s) may include a permit modification, a schedule for implementation, and an Interim Measures Workplan. The Administrative Authority may modify this Permit according to LAC 33:V.321 to incorporate interim measures into the Permit. However, depending upon the nature of the interim measures, a permit modification may not be required.

VIII.E.2. The Permittee may propose interim measures at any time by submittal of an Interim Measures Workplan subject to the approval of the Administrative Authority.

VIII.E.3. The Administrative Authority shall notify the Permittee in writing of the requirement to perform interim measures and may require the submittal of an Interim Measures Workplan. The following factors will be considered by the Administrative Authority in determining the need for interim measures and the need for permit modification:

VIII.E.3.a. Time required to develop and implement a final remedy;

VIII.E.3.b. Actual and potential exposure to human and environmental receptors;

VIII.E.3.c. Actual and potential contamination of drinking water supplies and sensitive ecosystems;

VIII.E.3.d. The potential for further degradation of the medium in the absence of interim measures;

VIII.E.3.e. Presence of hazardous wastes in containers that may pose a threat of release;

VIII.E.3.f. Presence and concentration of hazardous waste including hazardous constituents in soil that has the potential to migrate to ground water or surface water;

VIII.E.3.g. Weather conditions that may affect the current levels of contamination;

VIII.E.3.h. Risks of fire, explosion, or accident; and

VIII.E.3.i. Other situations that may pose threats to human health and the environment.

VIII.E.4. Upon approval of the Interim Measures Workplan and completion of the interim measure(s) implementation, the Permittee will submit a report to the Administrative Authority describing the completed work.

VIII.E.5. At anytime during or after the interim measure(s), including the issuance of an NFA-ATT, the Administrative Authority may require the Permittee to submit the SWMUs/AOCs for further corrective action.

VIII.F. CAS (CORRECTIVE ACTION STRATEGY) INVESTIGATION WORKPLAN

VIII.F.1. The CAS Investigation Workplan that describes site investigation activities for corrective action shall be submitted to the Administrative Authority within 180 days after the scoping meeting between the Permittee and the Administrative Authority. The CAS Investigation Workplan must address releases of hazardous waste or hazardous constituents to all media, unless otherwise indicated, for those SWMUs/AOCs identified in this permit. The focus of the site investigation phase for corrective action is to collect data to fill in data gaps identified in the CSM. The corrective action investigations may be conducted in phases if warranted by site conditions, contingent upon approval by the Administrative Authority.

VIII.F.1.a. The CAS Investigation Workplan shall describe the management options (MO) for each AOI/release area, data quality objectives for achieving each management option, and proposals for release characterizations (sampling and analysis/quality assurance plans) to support the data quality objectives (DQOs). (DQOs are determined based on the end use of the data to be collected, and the DQO development process should be integrated into project planning and refined throughout the CAS implementation. DQOs shall be used to 1) ensure that environmental data are scientifically valid, defensible, and of an appropriate level of quality given the intended use, and 2) expedite site investigations. The CAS Investigation Workplan is required to have DQOs that are developed to support the performance standard for each release.) The CAS Investigation Workplan shall detail all proposed activities and procedures to be conducted at the facility, the schedule for implementing and completing such investigations, the qualifications of personnel performing or directing the investigations, including contractor personnel, and the overall management of the site investigations. The scope of work for the site investigation can be found in RECAP Appendix B.

VIII.F.1.b. The CAS Investigation Workplan shall describe sampling, data collection quality assurance, data management procedures (including formats for documenting and tracking data and other results of investigations) and health and safety procedures.

VIII.F.1.c. Development of the CAS Investigation Workplan and reporting of data shall be consistent with the latest version of the following EPA and State guidance documents or the equivalent thereof:

VIII.F.1.c.(1) Guidance for the Data Quality Assessment, Practical Methods for Data Analysis. QA97 Version EPA QA/G-9. January 1998;

VIII.F.1.c.(2) Guidance for the Data Quality Objectives Process. EPA QA/G-4. September 1994;

VIII.F.1.c.(3) Data Quality Objectives Remedial Response Activities. EPA/540/G87-003. March 1987;

VIII.F.1.c.(4) Guidance on Quality Assurance Project Plans. EPA QA/G-5. February 1998;

VIII.F.1.c.(5) Interim EPA Data Requirements for Quality Assurance Project Plans. EPA Region 6, Office of Quality Assurance. May 1994;

VIII.F.1.c.(6) 29 CFR 1910.120 (b) for the elements to Health and Safety plans;

VIII.F.1.c.(7) RCRA Groundwater Monitoring: Draft Technical Guidance EPA/530-R-93-001 November 1992;

VIII.F.1.c.(8) Test Methods for Evaluating Solid Waste, Physical/Chemical Methods; SW-846, 3rd Edition. November 1992, with revisions;

VIII.F.1.c.(9) The LDEQ Handbook - Construction of Geotechnical Boreholes and Groundwater Monitoring Systems," prepared by the LDEQ and the Louisiana Department of Transportation and Development. This document is printed by and available from the Louisiana Department of Transportation and Development, Water Resources Section, P. O. Box 94245, Baton Rouge, Louisiana 70804-9245; and

VIII.F.1.c.(10) The LAC 33:I.Chapter 13 and Louisiana Department of Environmental Quality Risk Evaluation/Corrective Action Program (RECAP).

VIII.F.2. After the Permittee submits the CAS Investigation Workplan; the Administrative Authority will approve, disapprove, or otherwise modify the CAS Investigation Workplan in writing. All approved workplans become enforceable components of this Permit.

In event of disapproval (in whole or in part) of the workplan, the Administrative Authority shall specify deficiencies in writing. The Permittee shall modify the CAS Investigation Workplan to correct these within the time frame specified in the notification of disapproval by the Administrative Authority. The modified workplan shall be submitted in writing to the Administrative Authority for review. Should the Permittee take exception to all or part of the disapproval, the Permittee shall submit a written statement of the ground for the exception within fourteen (14) days of receipt of the disapproval.

VIII.F.3. The Administrative Authority shall review for approval, as part of the CAS Investigation Workplan or as a new workplan, any plans developed pursuant to Condition VIII.L addressing further investigations of newly-identified SWMUs/AOCs, or Condition VIII.M addressing new releases from previously-identified SWMUs/AOCs.

VIII.G. IMPLEMENTATION OF SITE INVESTIGATION ACTIVITIES UNDER CAS

No later than fourteen (14) days after the Permittee has received written approval from the Administrative Authority for the CAS Investigation Workplan, the Permittee shall implement the site investigation activities according to the schedules and in accordance with the approved CAS Investigation Workplan and the following:

VIII.G.1. The Permittee shall notify the Administrative Authority at least 10 working days prior to any field sampling, field-testing, or field monitoring activity required by this Permit to give LDEQ personnel the opportunity to observe investigation procedures and/or split samples.

VIII.G.2. Deviations from the approved CAS Investigation Workplan, which are necessary during implementation, must be approved by the Administrative Authority and fully documented and described in the progress reports (Condition VIII.C), RECAP Report (Condition VIII.H) and the final Risk Management Plan (Condition VIII.J).

VIII.H. RECAP REPORT

Within ninety (90) days after completion of the site investigation the Permittee shall submit a RECAP Report to the Administrative Authority for approval. The RECAP Report shall document the results of the site investigation activities, and the evaluation of the impacts from releases. The Administrative Authority will review and evaluate the report and provide the Permittee with written notification of the report's approval or a notice of deficiency. If the Administrative Authority determines the RECAP Report does not fully meet the objectives stated in the CAS Investigation Workplan (Permit Condition VIII.F), the Administrative Authority shall notify the Permittee in writing of the report's deficiencies, and specify a due date for submittal of a revised Final Report to the Administrative Authority.

VIII.H.1. The Permittee shall screen site-specific data using the appropriate RECAP standard (RS) for each AOI (depending on the MO), evaluate impacts from releases with exposure scenario evaluations, and update the Risk Management Profile of the CSM.

VIII.H.2. The report shall include, but not be limited to, the following:

VIII.H.2.a. Documentation of site investigation activities and results;

VIII.H.2.b. Evaluation of exposure scenarios to document impacts from releases;

VIII.H.2.c. Deviations from the CAS Investigation Workplan;

VIII.H.2.d. Results of screening activities using RECAP standards (RS), including SO, MO-1, MO-2, or MO-3 RS for each media;

VIII.H.2.e. The revised CSM with updated profiles which incorporate investigation and screening results; and

VIII.H.2.f. Proposed revisions to performance standards based on new information (e.g., change in land use, difference in expected receptors and/or exposure, or other differences in site conditions), if warranted.

VIII.I. REMEDIAL ALTERNATIVES STUDY

Upon completion and approval of the RECAP Report, the Permittee shall proceed with the evaluation of remedial alternatives to complete corrective action for each AOI according to the performance standards described in Condition VIII.A.2. The remedial alternatives shall be submitted to the Administrative Authority in the Remedial Alternatives Study (RAS) within ninety (90) days of the Administrative Authority's approval of the RECAP Report. In the Remedial Alternatives Study, the Permittee shall identify and evaluate various potential remedies that would meet the performance-based corrective action objectives and propose one or more specific remedies based on an evaluation of applicable data and available corrective action technologies. The RAS shall be prepared in a manner that addresses the extent and nature of the contamination at the facility.

VIII.I.1. The Permittee shall evaluate remedies for each AOI that shall:

VIII.I.1.a. attain compliance with corrective action objectives for releases of hazardous waste and/or hazardous constituents, as established in the Conceptual Site Model or in later investigations approved by the Administrative Authority;

VIII.I.1.b. control sources of releases;

VIII.I.1.c. meet acceptable waste management requirements;

VIII.I.1.d. protect human health and the environment; and

VIII.I.1.e. meet applicable statutory and regulatory requirements (as noted in Condition VIII.A.2.b).

VIII.I.2. The Permittee shall evaluate the use of presumptive remedies and innovative technologies to achieve the appropriate remedial performance standards for each AOI.

VIII.I.3. The Permittee shall review the current interim measures/ stabilization activities to evaluate if these measures meet all the criteria for final remedy.

VIII.I.4. If under certain site-specific conditions, or when it is not technically or economically feasible to attain the corrective action objectives, the Permittee may propose to use institutional controls to supplement treatment or containment-based remedial actions upon approval of the Administrative Authority (Section 2.15 of RECAP).

VIII.I.5. The RAS shall at a minimum include:

VIII.I.5.a. An evaluation of the performance reliability, ease of implementation, and the potential impacts of the potential remedies;

VIII.I.5.b. An assessment of the effectiveness of potential remedies in achieving adequate control of sources and meeting remedial performance standards;

VIII.I.5.c. An assessment of the costs of implementation for potential remedies;

VIII.I.5.d. An assessment of the time required to begin and complete the remedy;

VIII.I.5.e. An explanation of the rationale for the remedy proposed for each AOI or group of AOIs; and

VIII.I.5.f. An assessment of institutional requirements (e.g., state permit requirements that may impact remedy implementation).

VIII.I.6. The Administrative Authority will review and evaluate the RAS and provide the Permittee with written notification of the study's approval or a notice of deficiency. If the Administrative Authority determines the RAS does not fully meet the requirements detailed in Conditions VIII.I.1 through VIII.I.5, the Administrative Authority shall notify the Permittee in writing of the RAS's deficiencies, and specify a due date for submittal of a revised RAS to the Administrative Authority. In

addition, the Administrative Authority may require the Permittee to evaluate additional remedies or particular elements of one or more proposed remedies.

VIII.J. RISK MANAGEMENT PLAN

Within ninety (90) days of the Administrative Authority's approval of the RAS, the remedy/remedies proposed for selection shall be documented and submitted in the Risk Management Plan. The Permittee shall propose corrective action remedies in accordance with Chapter IV of the RCRA Corrective Action Plan (Final), May 1994, OSWER Directive 9902.3-2A or as directed by the Administrative Authority.

VIII.J.1. The Risk Management Plan shall at a minimum include:

VIII.J.1.a. A summary of the remedial alternatives for each AOI and the rationale used for remedy selection;

VIII.J.1.b. The final CSM with proposed remedies, including locations of AOIs addressed by a risk management activity, COC concentrations that represent the long-term fate and transport of residual COCs and the exposure pathways affected by the risk management activity;

VIII.J.1.c. Cost estimates and implementation schedules for proposed final remedies;

VIII.J.1.d. Proposed remedy design and implementation precautions, including special technical problems, additional engineering data required, permits and regulatory requirements, property access, easements and right-of-way requirements, special health and safety requirements, and community relations activities;

VIII.J.1.e. Remedy performance criteria and monitoring:

The Permittee shall identify specific criteria (such as land use changes, fate and transport model verification and constructed remedy performance) that will be evaluated to demonstrate that the risk management activity implemented will remain protective. A schedule for periodic performance review (such as monitoring data summaries, including graphical and statistical analyses) shall be established to demonstrate that the implemented activities are consistently achieving and maintaining desired results. Further, a mechanism shall be established to re-evaluate risk management activities in the event the implemented action does not achieve and maintain the performance standards;

VIII.J.1.f. Contingency plans; and

VIII.J.1.g. Description and schedules for performance reviews.

VIII.J.2. After the Permittee submits the Risk Management Plan, the Administrative Authority will review and evaluate the plan and subsequently either inform the Permittee in writing that the plan is acceptable for public review or issue a notice of deficiency.

VIII.J.3. If the Administrative Authority determines the Risk Management Plan does not fully meet the remedial objectives, the Administrative Authority shall notify the Permittee in writing of the plan's deficiencies and specify a due date for submittal of a revised Final Risk Management Plan. In addition, the Administrative Authority may require the Permittee to evaluate additional remedies or particular elements of one or more proposed remedies.

VIII.J.4. After the Administrative Authority has determined the Risk Management Plan is acceptable for public review, the Administrative Authority shall inform the Permittee in writing and instruct the Permittee to submit the plan as a Class 3 permit modification request in accordance with the requirements of LAC 33:V.321.C.3.

VIII.J.5. After conclusion of a 60-day comment period, the Administrative Authority will either grant or deny the Class 3 permit modification request. In addition the Administrative Authority must consider and respond to all significant comments received during the 60-day comment period.

VIII.J.6. If the Class 3 Modification request is granted, the Administrative Authority shall prepare a draft permit incorporating the proposed changes in accordance with LAC 33:V.703.C.

VIII.J.7. If, after considering all public comments, the Administrative Authority determines that the Risk Management Plan is adequate and complete, the Administrative Authority will issue a public notice for final approval the Class 3 permit modification. The resultant modified permit will include schedules for remedy implementation as well as financial assurance provisions as required by Condition VIII.A.5 of this permit.

VIII.K. DETERMINATION OF NO FURTHER ACTION

VIII.K.1. NFA-ATT DETERMINATIONS FOR SPECIFIC SWMUs/AOCs

VIII.K.1.a. Based on the results of the site investigations, screening, risk evaluations and risk management activities, the Permittee may request a NFA-ATT determination for a specific SWMU/AOC by submittal of a Class 1¹ permit modification request under LAC 33:V.321.C.1. The NFA-ATT request must contain information demonstrating that there are no releases of hazardous constituents from a particular SWMU/AOC that pose a threat to human health and/or the environment.

¹ Class 1 modifications marked by a superscript "1" require Administrative Authority approval prior to implementation in accordance with LAC 33:V.321.C.1.b.

The basis for the determination of NFA-ATT shall follow the guidelines as described in the RECAP (Section 1.2.1 of RECAP) for each AOI, depending on the MO used.

VIII.K.1.b. If, based upon review of the Permittee's request for a permit modification, the results of the site investigations, and other information the Administrative Authority determines that releases or suspected releases from an individual SWMU/AOC which were investigated either are non-existent or do not pose a threat to human health and/or the environment, the Administrative Authority may grant the requested modification.

VIII.K.1.c. In accordance with LAC 33:V.321.C.1.a.ii, the Permittee must notify the facility mailing list within ninety (90) days of the Administrative Authority's approval of the Class 1¹ permit modification request.

VIII.K.2. FACILITY-WIDE NFA-ATT DETERMINATION

VIII.K.2.a. Upon the completion of all activities specified in the Risk Management Plan and after all SWMUs and AOCs at the facility have been remediated according to the standards dictated by the selected RECAP MO, the Permittee shall submit a summary report supporting a determination of NFA-ATT on a facility-wide basis.

VIII.K.2.b. The summary report must include a historical narrative for each SWMU/AOC at the site that includes a summary of the investigation, sampling & analysis, remedial, and confirmatory sampling activities leading to the NFA-ATT request. The basis for the determination of NFA-ATT shall follow the guidelines as described in the RECAP (Section 1.2.1 of RECAP) for each AOI, depending on the MO used. The facility-wide NFA-ATT determination must consider any newly-identified SWMUs/AOCs discovered after submittal of the Risk Management Plan.

VIII.K.2.c. The Administrative Authority will review and evaluate the summary report and subsequently either inform the Permittee in writing that the report is acceptable for public review or issue a notice of deficiency.

VIII.K.2.d. If the Administrative Authority determines the summary report does not fully demonstrate that all remedial objectives have been satisfied, the Administrative Authority shall notify the Permittee in writing of the summary report's deficiencies and specify a due date for submittal of a revised summary report.

VIII.K.2.e. After the Administrative Authority has determined the facility-wide NFA-ATT summary report is acceptable for public review, the Administrative Authority shall inform the Permittee in writing and instruct the

Permittee to submit the summary report as a Class 3 permit modification request in accordance with the requirements of LAC 33:V.321.C.3.

VIII.K.2.f. After conclusion of a 60-day comment period, the Administrative Authority will either grant or deny the Class 3 permit modification request. In addition the Administrative Authority must consider and respond to all significant comments received during the 60-day comment period.

VIII.K.2.g. If, based upon review of the Permittee's Class 3 permit modification request, the results of the site investigations, confirmatory sampling, and other pertinent information, the Administrative Authority determines that all SWMUs and AOCs have been remediated to the selected MO and no further action at the facility is warranted, the Administrative Authority will grant the modification request.

VIII.K.2.h. If the Class 3 Modification request is granted, the Administrative Authority shall prepare a draft permit incorporating the proposed changes in accordance with LAC 33:V.703.C and solicit public comment on the draft permit modification according to Condition VIII.N.4 of this permit.

VIII.K.2.i. If, after considering all public comments, the Administrative Authority determines that all activities specified in the Risk Management Plan have been completed and that all SWMUs and AOCs have been remediated to the selected MO, the Class 3 permit modification for facility-wide NFA-ATT will receive final approval. The CAS permit conditions will remain a part of the modified permit in the event that the remedial actions taken fail to maintain the established performance standard and to address any SWMUs/AOCs discovered at a later date.

VIII.K.3. CONTINUED MONITORING

If necessary to protect human health and/or the environment, a determination of NFA-ATT shall not preclude the Administrative Authority from requiring continued monitoring of air, soil, groundwater, or surface water, when site-specific circumstances indicate that releases of hazardous waste or hazardous constituents are likely to occur.

VIII.K.4. ADDITIONAL INVESTIGATIONS

A determination of NFA-ATT shall not preclude the Administrative Authority from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates a release or likelihood of a release from a SWMU/AOC at the facility that is likely to pose a threat to human health and/or the environment. In such a case, the Administrative Authority shall initiate a modification to the Permit according to LAC 33:V.321.

VIII.L. NOTIFICATION REQUIREMENTS FOR AND ASSESSMENT OF NEWLY-IDENTIFIED SWMUs AND POTENTIAL AOCs

VIII.L.1. The Permittee shall notify the Administrative Authority, in writing, of any newly-identified SWMUs and potential AOCs (i.e., a unit or area not specifically identified during previous corrective action assessments, RFA, etc.), discovered in the course of ground water monitoring, field investigations, environmental audits, or other means, no later than thirty (30) days after discovery. The Permittee shall also notify the Administrative Authority of any newly-constructed land-based SWMUs (including but not limited to, surface impoundments, waste piles, landfills, land treatment units) and newly-constructed SWMUs where any release of hazardous constituents may be difficult to identify (e.g., underground storage tanks) no later than thirty (30) days after construction. The notification shall include the following items, to the extent available:

VIII.L.1.a. The location of the newly-identified SWMU or potential AOC on the topographic map required under LAC 33:V.517.B. Indicate all existing units (in relation to other SWMUs/AOCs);

VIII.L.1.b. The type and function of the unit;

VIII.L.1.c. The general dimensions, capacities, and structural description of the unit (supply any available drawings);

VIII.L.1.d. The period during which the unit was operated;

VIII.L.1.e. The specifics, to the extent available, on all wastes that have been or are being managed at the SWMU or potential AOC; and

VIII.L.1.f. Results of any sampling and analysis required for the purpose of determining whether releases of hazardous waste including hazardous constituents have occurred, are occurring, or are likely to occur from the SWMU/AOC.

VIII.L.2. Based on the information provided in the notification, the Administrative Authority will determine whether or not the area is a newly-identified SWMU or AOC. If the area is determined to be a newly-identified SWMU or AOC, the Administrative Authority will inform the Permittee in writing and request that the Permittee submit a Class 1¹ permit modification request under LAC 33:V.321.C.1 to add the newly-identified SWMU/AOC this permit as an attachment.

Further, the Administrative Authority will determine the need for further investigations or corrective measures at any newly identified SWMU or AOC. If the Administrative Authority determines that such investigations are needed, the Administrative Authority may require the Permittee to prepare a plan for such investigations. The plan for investigation of SWMU or AOC will be reviewed for

approval as part of the current CAS Investigation Workplan or a new CAS Investigation Workplan. The results of the investigation of any newly-discovered SWMU/AOC shall be incorporated into the CSM.

VIII.M. NOTIFICATION REQUIREMENTS FOR NEWLY-DISCOVERED RELEASES AT A SWMU OR AOC

The Permittee shall notify the Administrative Authority of any release(s) from a SWMU or AOC of hazardous waste or hazardous constituents discovered during the course of ground water monitoring, field investigation, environmental auditing, or other means. The notification must be in accordance with the procedures specified in Conditions II.E.16 through II.E.20 of this permit and based upon the nature, extent, and severity of the release. Such newly-discovered releases may be from newly-identified SWMUs or AOCs, newly-constructed SWMUs, or from SWMUs or AOCs for which, based on the findings of the CSM, completed RECAP Report, or investigation of an AOC, the Administrative Authority had previously determined no further investigation was necessary. The notification shall include information concerning actual and/or potential impacts beyond the facility boundary and on human health and the environment, if available at the time of the notification.

The Administrative Authority may require further investigation and/or interim measures for the newly-identified release(s), and may require the Permittee to prepare a plan for the investigation and/or interim measure. The plan will be reviewed for approval as part of the CAS Investigation Workplan or a new CAS Investigation Workplan. The Permit will be modified to incorporate the investigation, according to the Class 1¹ permit modification procedures under LAC 33:V.321. The results of the investigation of any newly-identified release(s) shall be incorporated into the CSM.

VIII.N. PUBLIC PARTICIPATION REQUIREMENTS

Public participation is an essential element in the implementation of any corrective action program at the facility. The CAS promotes the early and continued involvement of stakeholders in site remediation activity during permit issuance, renewal, or modification. The public is invited to review and comment on the corrective action requirements contained in any draft permitting decisions or draft permit modification documents and the associated plans and reports submitted by the Permittee. The Administrative Authority reserves the right to require more extensive public participation requirements based upon site-specific conditions and other relevant factors (e.g., compliance history, potential offsite impact, community interest, etc.).

Any proposed change(s) in the Corrective Action Objectives and the associated remedies contained in this permit will required a class 3 permit modification as per LAC 33:V.321.C.3. All and any other proposed changes to the permit must be submitted to the Administrative Authority as permit LAC 33:V.321 and 322. The Permittee must summarize the changes to the corrective action from the previous year in the annual report. The Administrative Authority may require the Permittee to send a summary of changes to the corrective action to the facility mailing list, depending on the significance of the changes.

VIII.O. DISPUTE RESOLUTION

The Permittee must follow the procedures detailed in Conditions VIII.O.1 through VIII.O.6 below to dispute a judgment by or requirement from the Administrative Authority regarding the corrective action requirements of this permit. Such actions that may be disputed include, but are not limited to: the requirements under Conditions VIII.L and M; implementation of work plans; approval of documents; scheduling of any work; or selection, performance, or completion of any corrective action. The Permittee's failure to follow the procedures set forth in Condition VIII.O will constitute a waiver of its right to further consider the dispute.

VIII.O.1. The parties (i.e., the LDEQ and the Permittee) shall use their best efforts to informally and in good faith resolve all disputes or differences of opinion. If, however, disputes arise concerning the corrective action which the parties are unable to resolve informally, the following procedures shall apply. If the Permittee disputes its ability to meet a specific deadline or directive, then the Permittee is obligated to advise the Administrative Authority of the issue at least 14 days in writing in advance of the deadline.

VIII.O.2. The Administrative Authority shall provide the Permittee written notice of its disapproval or modification within 30 days. The written notice of disapproval or modification shall set forth the reasons for the disapproval or modification.

VIII.O.3. If the Permittee disagrees, in whole or in part, with any such written notice, the Permittee shall notify the Assistant Secretary of LDEQ's Office of Environmental Services, in writing, within 14 days of receipt of the written notice.

VIII.O.4. The Permittee and the pertinent LDEQ staff shall use their best efforts to informally and in good faith resolve the dispute. Accordingly, the Permittee is entitled to meet with LDEQ staff in person at the Administrative Authority's office or by teleconference, if it so desires, in order to resolve the dispute.

VIII.O.5. If the Permittee and the LDEQ staff are unable to resolve the dispute, the Permittee may make a written request for a final decision by the Administrative Authority. The written statement should include, at a minimum, the specific points of dispute, the position the Permittee maintains should be adopted as consistent with the Permit requirements and the basis therefore, any matters which it considers necessary for proper determination of the dispute, and whether the Permittee requests an informal conference in front of the Administrative Authority.

VIII.O.6. Subsequently, the Administrative Authority will issue a final decision within 30 days of the request.

VIII.P. SUMMARY OF CORRECTIVE ACTION REQUIREMENTS

The Permittee submitted the Integrated Final Corrective Measures Study (IFCMS) to the Administrative Authority as a condition of Section X of the Permittee's previously active Wastewater Treatment Unit, LAD008086506-PC-MO-1. The purpose of the IFCMS was to incorporate and update all previous information regarding the proposed corrective measures for the PPG Lake Charles Complex. Because of the nature and extent of the contamination at the Lake Charles Complex, remedies were not selected based on contamination at specific areas but on goals or objectives that if met at the PPG Lake Charles Complex would be protective of human health and the environment. These goals are called Corrective Action Objectives (CAOs). Six corrective action objectives were selected:

- (1) prevention of human exposures to groundwater containing COCs at concentrations that exceed the relevant RECAP GW1 standards for the 70/80 foot Water Bearing Unit (WBU) and the 200 foot Chicot Aquifer,
- (2) control to the extent practicable, the migration of COCs from source (DNAPL) area to groundwater,
- (3) control to the extent practicable, the migration of COCs from source areas to groundwater, prevention of unacceptable ecological risk associated with exposure to COCs in sediment in the Isolated Portion of the PPG Canal, the area south of the South Closure, the Lower PPG Canal, and the North Section of the Sabine River Water Pond,
- (4) prevent, to the extent practicable, the migration of COCs from the North Section of the PPG Canal to the Lower PPG Canal or Bayou d'Inde at levels that would cause sediment or surface water to pose an unacceptable ecological risk,
- (5) prevent, to the extent practicable, the lateral migration of COCs in groundwater into the Barge Slip, Bayou Verdine, and the Coon Island Reach at levels that would cause sediment or surface water to pose an unacceptable risk, and
- (6) control on-site worker dermal contact with, or ingestion of, COCs in soils, sediment, and shallow groundwater in accordance with applicable RECAP requirements.

For each CAO, this permit will list the remedies selected, assessment methodology, reportable parameters, and enforceable limits. This information will be addressed in Attachment 2 of this permit. The Permittee must maintain and operate the corrective action systems in accordance with this permit and specifically with the documents required to be maintained onsite as per Condition II.E.28 and the Attachments 2 through 6 of this permit.

Attachment 2 details the corrective action objectives and associated remedy selections. Attachment 3 details the annual corrective action reporting requirements. Attachment 4 contains the implementation schedule for the activities required by the permit but have not

yet been built or implemented at the time of issuance of the final permit. Attachment 5 contains the site wide analyte list, which is the list of compounds that the Permittee must monitor in accordance with the approved sampling and analysis plan. Attachment 6 contains the site specific HSWA requirements for the operating and maintenance of the corrective action at the Lake Charles Complex.

ATTACHMENT 1

ATTACHMENT 1
LIST OF FACILITY DOCUMENTS INCORPORATED
IN THE PERMIT BY REFERENCE
LAD008086506
AI#1255

DOCUMENT TYPE	APPLICATION /DOCUMENT DATE	ELECTRONIC DATABASE MANAGEMENT SYSTEM (EDMS) DOCUMENT ID	COMMENTS
Arrangement with local authorities	7/14/2008	37123853	Permit Application, Volume 4, Attachment 7, Page 76 of the EDMS Document
Inspection Schedule	10/30/2007	36372011	Permit Application, Attachment 9, Page 114 of the EDMS Document
Security Plan	2/09/2005	32643318	Permit Application Volume 1, Chapter 15, page 160 of the EDMS Document
Personnel Training Plan	2/21/2007	35704681	Permit Application, Attachment 15, Page 510 of the EDMS Document
Post-Closure and Corrective Measures Plans	10/30/2007	36372011	Permit Application, Attachment 10, Page 123 of the EDMS Document

ATTACHMENT 2

TABLE 1

Corrective Action Objective 1

Prevention of human exposures to groundwater containing COCs at concentrations that exceed the relevant RECAP GW1 standards for the 70/80 Foot WBU and the 200 Foot Chicot Aquifer

<u>Remedy Selected for CAO</u>	<u>Monitoring or Assessment Method</u>	<u>Reportable Parameter for Each Remedy</u>	<u>Enforceable Limit</u>
<p>Aquiclude Containment System (ACS) - Provide control of constituent sources and/or containment of constituents in the Semi-confined WBU and the 70/80-Foot WBU by operating the ACS, which includes the Semi-confined WBU Recovery System ICM and 70/80 Foot WBU Containment System ICM (including the 120 ft. WBU monitoring wells and 145-Foot WBU withdrawal well), along with appropriate on-site treatment and disposal of recovered groundwater. The Upper ACS also contributes to the overall objective through reduction of mass available for vertical migration to the 70/80-Foot WBU and 200-Foot Sand.</p> <p>Chicot Containment System - Provide containment of constituents in the 200-Foot Sand by continued operation of the Chicot Containment System, which includes the Chicot Stabilization System ICM, along with appropriate on-site treatment and disposal of recovered groundwater. The Chicot Containment System consists of the Chicot Stabilization System ICM and the two on-site 500 Foot Sand monitoring wells.</p> <p>Institutional Controls - Implement institutional controls, which are non-engineered measures that minimize the potential for human exposure to COCs by limiting land or resource use. Prohibit installation of any new potable water supply well at the facility in the 70/80-Foot WBU or 200-Foot Sand within the area defined as the TI Zone. Provide guidelines for installation of any new potable water wells in the 500-Foot or 700-Foot Sand within the TI zone to require properly sealed boreholes.</p> <p>Groundwater Treatment and Disposal - Implement groundwater treatment and disposal systems, including treatment of liquids recovered by the groundwater extraction and containment systems and destruction of DNAPL recovered by the HWRS.</p>	<p>Evaluate perimeter COC concentrations in these zones relative to GW1 standards through a combination of compliance monitoring and groundwater modeling. PPG will conduct such monitoring at designated monitoring wells to ensure that hazardous waste constituents will not escape the facility boundaries at concentrations that would pose an excess risk per the RECAP groundwater standards.</p> <p>The ground water monitoring will be conducted in accordance with the PPG Site-wide Groundwater Sampling and Analysis Plan.</p>	<p>Reportable parameters for the operation and maintenance of the recovery systems include recovery rates and volumes or constituent mass.¹</p>	<p>Constituent concentrations shall not exceed GW1 standards at water supply wells completed in the 70/80-Foot WBU or 200-Foot Sand of the Chicot Aquifer.</p>
<p>Institutional Controls - Implement institutional controls that (a) prohibit installation of any new potable water supply well in the 70/80-Foot WBU or 200-Foot Sand within the area defined as the TI Zone, and (b) provide guidelines for installation of any new potable water wells in the 500-Foot or 700-Foot Sand within the TI zone.</p>	<p>Reportable parameters will include constituent concentrations in downgradient perimeter monitoring wells of the 70/80-Foot WBU and 200-Foot Sand of the Chicot Aquifer.</p>		<p>Permittee shall implement institutional controls that (a) prohibit installation of any new potable water supply well in the 70/80-Foot WBU or 200-Foot Sand within the area defined as the TI Zone, and (b) provide guidelines for installation of any new potable water wells in the 500-Foot or 700-Foot Sand within the TI zone.</p>
<p>The modeling assessment will utilize indicators of control such as estimated hydraulic gradients, groundwater flow paths and constituent migration.</p>	<p>Reportable parameters for the modeling demonstration of containment include estimated hydraulic gradients, groundwater flow paths, and extent of constituent migration.¹</p> <p>Reportable parameters for the operation and maintenance of the groundwater treatment and disposal systems include treated ground water volumes/constituent mass.¹</p>		
<p>Reportable parameters for implementation of institutional controls include documentation of the legal instrument prohibiting potable water well installation in relevant zones, and active maintenance of the guidelines for potable well installation in the 500-Foot or 700-Foot Sand.</p>			

¹These reportable parameters are also applicable to CAO2 and CAO5, but not repeated in this Attachment. Reference to RECAP standards in this attachment means these standards are identified in the IFCMS (2006).

TABLE 2

Table 2
Corrective Action Objective 2

Control to the extent practicable, the migration of COCs from source (DNAPL) area to groundwater

<u>Remedy Selected for CAO</u>	<u>Monitoring or Assessment Method</u>	<u>Reportable Parameter for Each Remedy</u>	<u>Enforceable Limit</u>
<p>DNAPL Recovery and Containment - Provide control of the source of mobile DNAPL in the Unconfined WBU by operating the HWRS ICM in the South Terminal Area for as long as it is effectively removing mobile DNAPL, along with appropriate disposal of recovered DNAPL and on-site treatment of recovered groundwater.</p> <p>Aquitar Containment System (ACS) - Provide control of constituent sources and/or containment of constituents in the Semiconfined WBU and the 70/80-Foot WBU by operating the Upper and Lower ACS, along with appropriate on-site treatment and disposal of recovered groundwater. The ACS components additional to the HWRS ICM include the North Dock</p> <p>Monitoring/Withdrawal System ICM and the South Terminal Stabilization System ICM, Semiconfined WBU Recovery System ICM, RPC Shoreline ICM, the remaining components of Derivatives area ICMs and the Closed WTU Surge Pond Recovery System, and the 70/80-Foot WBU Containment System.</p> <p>Chicot Containment System - Provide containment of constituents in the 200-Foot Sand by continued operation of the Chicot Containment System, which includes the Chicot Stabilization System ICM, along with appropriate on-site treatment and disposal of recovered groundwater. The Chicot Containment System consists of the Chicot Stabilization System ICM and the two on-site 500 Foot Sand monitoring wells.</p> <p>Groundwater Treatment and Disposal - Implement groundwater treatment and disposal systems, including treatment of liquids recovered by the groundwater extraction and containment systems and destruction of DNAPL recovered by the HWRS.</p>	<p>Evaluate operations of corrective measures components for practicable effectiveness, using indicators such as hydraulic gradients, recovery volumes/mass, recovery efficiency, dissolved plume extent, and constituent concentration trends over time.</p>	<p>Reportable parameters for the demonstration of control of migration from source areas include mass recovery from the DNAPL recovery system.</p>	<p>Permittee shall operate and maintain the HWRS for as long as it is effectively removing mobile DNAPL.</p>

TABLE 3

Table 3
Corrective Action Objective 3
Prevent unacceptable ecological risk
 associated with exposure to COCs in
 sediment in the Isolated Portion of the PPG
 Canal, the Area South of the South Closure,
 the Lower PPG Canal, and the North Section
 of the SRWP.

<u>Corrective Action Objective</u> <u>(CAO)</u>	<u>Remedy Selected for CAO</u>	<u>Monitoring or Assessment Method</u>	<u>Reportable Parameter for Each Remedy</u>	<u>Enforceable Limit</u>
Prevent unacceptable ecological risk associated with exposure to COCs in sediment in the Isolated Portion of the PPG Canal, the Area South of the South Closure, the Lower PPG Canal, and the North Section of the SRWP.	In Situ Capping – Mitigate direct exposure pathway through placement of a cap over impacted sediments in the Isolated Canal (including isolated portion of Silicas Ditch), Area South of the South Closure, Lower PPG Canal (including Bypass Canal downstream of the Future Canal Reroute), and North Section of the SRWP.	Evaluate effectiveness of sediment caps (where applicable) through methods such as visual inspection, survey of elevations, probing seams of capping system for integrity, and other specified maintenance procedures.	Reportable parameters shall include summary of the maintenance and inspection/assessment of the sediment capping systems.	Permittee shall install and maintain sediment caps.
			Reportable parameters include indicators of cap integrity, such as thickness and areal extent.	

TABLE 4

Table 4
Corrective Action Objective 4

Prevent, to the extent practicable, the migration of COCs from the North Section of the PPG Canal to the Lower PPG Canal or Bayou d'Inde at levels that would cause sediment or surface water to pose an unacceptable ecological risk.

<u>Corrective Action Objective</u> (CAO)	<u>Remedy Selected for CAO</u>	<u>Monitoring or Assessment Method</u>	<u>Reportable Parameter for Each Remedy</u>	<u>Enforceable Limit</u>
Prevent, to the extent practicable, the migration of COCs from the North Section of the PPG Canal to the Lower PPG Canal or Bayou d'Inde at levels that would cause sediment or surface water to pose an unacceptable ecological risk.	In Situ Capping – Mitigate the migration of affected sediment and COCs through placement of a cap over impacted sediments in the North Section of PPG Canal (including West Arm, Riverside Powerhouse Canal, and Bypass Canal upstream of the Future Canal Reroute).	Evaluate effectiveness of sediment caps (where applicable) through methods such as visual inspection, survey of elevations, probing seams of capping system for integrity, and other specified maintenance procedures.	Reportable parameters shall include summary of the maintenance and inspection/assessment of the sediment capping systems.	Permittee shall install and maintain sediment caps.
		Surface Water monitoring will be performed periodically at the facility as required by the Clean Water Act under PPG's LPDES permit.	Reportable parameters include indicators of cap integrity, such as thickness and areal extent.	

TABLE 5

Table 5
Corrective Action Objective 5
 Prevent, to the extent practicable, the lateral migration of COCs in groundwater into the Barge Slip, Bayou Verdine, and the Coon Island Reach at levels that would cause sediment or surface water to pose an unacceptable risk.

<u>Corrective Action Objective (CAO)</u>	<u>Remedy Selected for CAO</u>	<u>Monitoring or Assessment Method</u>	<u>Reportable Parameter for Each Remedy</u>	<u>Enforceable Limit</u>
Prevent, to the extent practicable, the lateral migration of COCs in groundwater into the Barge Slip, Bayou Verdine, and the Coon Island Reach at levels that would cause sediment or surface water to pose an unacceptable risk.	<p>Aquitar Containment System (ACS) - Provide control of the lateral migration of constituents in groundwater into the Barge Slip, Bayou Verdine, and the Coon Island Reach by continued operation of the ACS, which includes the North Dock Monitoring/Withdrawal System ICM and the South Terminal Stabilization System ICM, along with appropriate on-site treatment and disposal of recovered groundwater.</p> <p>Groundwater Treatment and Disposal - Implement groundwater treatment and disposal systems, including treatment of liquids recovered by the groundwater extraction and containment systems and destruction of DNAPL recovered by the HWRS.</p>	Evaluate operations of corrective measures components for effectiveness, to the extent practicable, using indicators such as hydraulic gradients, recovery volumes/mass, recovery efficiency, constituent concentration trends over time, and groundwater modeling results.	Reportable parameters for the modeling demonstration of containment include estimated hydraulic gradients, groundwater flow paths, and extent of constituent migration.	Eliminate groundwater discharge to the Barge Slip, Bayou Verdine, and the Coon Island Reach.

TABLE 6

Table 6
Corrective Action Objective 6

Control on-site worker dermal contact with, or ingestion of, COCs in soils, sediment, and shallow groundwater in accordance with applicable RECAP requirements.

<u>Corrective Action Objective</u>	<u>Remedy Selected for CAO</u>	<u>Monitoring or Assessment Method</u>	<u>Reportable Parameter for Each Remedy</u>	<u>Enforceable Limit</u>
Control on-site worker dermal contact with, or ingestion of, COCs in soils, sediment, and shallow groundwater in accordance with applicable RECAP requirements.	In Situ Capping of Sediment - Mitigate direct contact pathway through placement of a cap over sediments containing observed or inferred DNAPL, which may present risk upon worker contact.	Evaluate effectiveness of soil cap (where applicable) through methods such as visual inspection, survey of elevations, and other specified maintenance procedures.	Reportable parameters shall include summary of the maintenance and inspection/assessment of the soil capping system.	Worker direct contact risk with soil, sediment, and shallow groundwater shall not exceed RECAP target risk range. Where DNAPL is present and quantitation of risk is not practicable, prevention of significant risk shall be accomplished with institutional controls and/or appropriate protective equipment.
	Soil Capping In South Terminal - Mitigate direct contact pathway through capping of in-place surface soils with clay and topsoil or clay and limestone or concrete paving in South Terminal area AOI 14a and 14b. Institutional Controls - Control direct contact with subsurface soil potentially containing DNAPL by establishing standards for the performance of subsurface work within AOIs with soil containing observed or inferred DNAPL. In addition, establish standards which also prohibit transfer of affected soils located at 3 to 15 feet within these AOIs to the surface unless tested and demonstrated to meet applicable direct contact standards.		Reportable parameters include indicators of cap integrity, such as thickness and areal extent.	
			Reportable parameters for implementation of institutional controls include active maintenance of the standards developed for the performance of subsurface work at specific AOIs (e.g., 3, 4, 8, 14).	

ATTACHMENT 3

Reporting Requirements

Annual and Other Reporting Requirements

The following reporting requirements shall be addressed at a minimum frequency of annually. The permittee may provide additional (e.g., interim) reports, if desired, to support progress in implementation of the corrective action program.

1. Groundwater Corrective Measures Report, including the following:
 - a. Statement of Corrective Action Objectives (CAOs)
 - b. Identification of remedy components and status of implementation
 - c. Identification of monitoring and assessment methods for each remedy component or CAO
 - d. Sampling procedures, analytical procedures, and Quality Assurance/Quality Control procedures
 - e. Modeling (and other assessment) method procedures
 - f. Presentation of groundwater flow data collected during the reporting period, and interpretation of flow within the groundwater zones of interest
 - g. Presentation of chemical analytical and water quality indicator data collected during the reporting period, and interpretation of constituent distribution and water quality within each zone of interest
 - h. Presentation of modeling results and interpretation of constituent migration (fate and transport) evaluations
 - i. Evaluation of the effectiveness of remedy relative to CAOs during the reporting period
 - j. Recommendations for future implementation (e.g., modifications to operations, monitoring, assessment methods or frequency)
 - k. Graphical presentation of constituent concentrations over time at selected monitoring locations
 - l. Summary of maintenance activities completed during the reporting period
2. Soil, Sediment, and Other Corrective Measures (e.g., Enclosed Structure Management, Institutional Controls) Report, including the following:
 - a. Statement of CAOs
 - b. Identification of remedy components and status of implementation
 - c. Identification of monitoring and assessment methods for each component implemented
 - d. Presentation of monitoring/assessment results
 - e. Evaluation of the effectiveness of remedy during the reporting period
 - f. Recommendations for future implementation (e.g., modifications to operations, monitoring, assessment methods or frequency)
 - g. Summary of maintenance activities completed during the reporting period
3. Updates to Permit-Related Plans

ATTACHMENT 4

Implementation Schedule

➤ Integrated Site-wide Sampling and Analysis Plan (SAP)

PPG will integrate the existing Closed WTLI Surge Pond Groundwater SAP and Site-wide Groundwater SAP into one plan in order to facilitate management of all ground water monitoring and evaluation at the PPG facility in accordance with LAC 33 :V.3301 .G. The combined plan is to incorporate all ground water monitoring activities associated with the site Areas of Investigation (AOIs) as described in the Integrated Final Corrective Measures Study (IFCMS) Report. Additional topics to be addressed within the combined plan will consist of quality assurance and quality control procedures (QA/QC), quality assurance protocols (QAP), monitoring data review and evaluation (statistical procedures or performance criteria as applicable to AOIs and consistent with the IFCMS), and data reporting procedures. The Integrated Site-wide Groundwater SAP has been provided to LDEQ, and was approved by LDEQ on April 2, 2009, and will become effective upon the effective date of the permit.

The Integrated Site-wide Groundwater SAP will be maintained on-site. PPG will annually review the corrective action program to determine if modifications to the SAP are necessary to maintain the effectiveness of the site-wide corrective action programs. The results of the evaluation are to be reported in a Corrective Action Report. If revisions to the SAP are necessary to support the corrective action program, then the revised portions of the SAP will be included in the annual Corrective Action Report. If at any point PPG determines that the monitoring and corrective action measures no longer satisfy the requirements of the IFCMS and LAC 33:V.3301.G, an application for a permit modification to make appropriate changes to the program will be submitted to the administrative authority within 90-days.

➤ Proposed Final Corrective Measures for Soil and Sediment:

South Terminal Soil Cap

The final corrective measures for soil include capping of AOIs 14a and 14b in South Terminal. This measure will be completed by placing soil or concrete on approximately 15 acres.

Within 240 days following the effective date of the permit, PPG will submit, to LDEQ for their approval, a Final Design Plan for the South Terminal Soil Cap. The Final Design Plan will include an Implementation Schedule (project schedule) and an Operation and Maintenance (O&M) Plan.

Sediment Caps

For the following water features, the final sediment corrective measures include capping:

- 1) North Section of the PPG Canal
- 2) Lower Section of the PPG Canal
- 3) Area South of South Closure
- 4) Isolated Canal
- 5) North Section of the Sabine River Water Pond.

Within 360 days following the effective date of the permit, PPG will submit to LDEQ, for their approval, a Final Design Plan for sediment capping actions. The Final Design Plan will include Final Designs, Implementation Schedules (project schedules) and Operation and Maintenance (O&M) Plans for the water features.

Interim Corrective Measures

Sediment interim corrective measures were proposed for the Isolated Canal and North Section of the PPG Canal. On July 18, 2007, LDEQ granted conditional approval of the proposed sediment ICMs. Sediment ICMs are being implemented in accordance with the ICM work plan, and ICM construction will be ongoing or completed prior to the effective date of the final permit. In this event, ICM approval provisions will govern until construction is completed. Then, provisions of the final permit will take precedence.

Construction Reports

Once construction begins, quarterly construction reports will be submitted to LDBQ until all soil and sediment corrective measures have been implemented. As major project elements (South Terminal Soil Cap; North Section, PPG Canal; Lower Section, PPG Canal; Area South of South Closure; Isolated Canal; North Section, Sabine River Pond) are completed, PPG will supply LDEQ with notices that the elements were completed in accordance with their respective Final Design Plans. PPG will then execute O&M Plans in accordance with conditions set forth in Final Design Plans and/or the final permit.

➤ Final Enclosed Structures Corrective Measures:

PPG has documented OSHA compliance in support of the use of Applicable or Relevant and Appropriate Requirements (ARARs) for RECAP Enclosed Structure exposure criteria within the IFCMS Report. As a condition for continued use of ARARs as exposure criteria, PPG will complete and document an annual assessment to determine the continued applicability of the Enclosed Structure Management Program within the IFCMS. The assessment will utilize relevant site data collected during the previous reporting period, and documentation of the assessment will be presented in the annual Corrective Action Report.

➤ **Institutional Controls:**

PPG will prepare the following documents to implement institutional controls as described in the IFCMS Report. The documents will be prepared within 180 days of the effective date of the permit.

- Restriction in the conveyance and/or deed records of Calcasieu Parish that prohibits installation of any new potable water supply well in the 70/80-Foot WBU or 200-Foot Sand within TI Zone.
- PPG will establish well installation procedures for future on-site well installations which require that any new potable water supply wells installed in the 500-Foot or 700-Foot sands within the TI Zone will utilize secondary isolation casings to seal off identified affected aquifer zones and strata above the well production zone.
- Restriction in the conveyance and/or deed records of Calcasieu Parish related to excavation work within potential surface soil (3-15 ft bgs) in AOIs 3, 4, 7, 8, and 14. The restriction will include a prohibition on leaving such excavated soil at the surface (within the 0 to 3 foot interval) if constituent concentrations exceed RECAP Screening Standards for industrial direct contact, and prohibition on reuse of such soil unless it meets applicable soil reuse standards.
- PPG will implement an excavation permit system (to be incorporated into facility Health & Safety Program). The program will incorporate measures to limit and appropriately manage excavations in areas where deed restrictions for affected potential surface soil (3-15 ft bgs) are in place for AOIs 3, 4, 7, 8, and 14.

➤ **Financial Assurance:**

PPG is required to maintain and update financial assurance mechanism(s), as necessary, to cover costs associated with post closure care of the WTU Surge Pond in accordance with provisions of LAC 33:V.3711, as well as costs associated with site-wide corrective action under LAC 33:V.3322.

Within 180 days following effective date of the approved Integrated Site-wide Groundwater SAP, PPG will submit to LDEQ documentation of appropriate financial assurance. Updates to financial assurance documentation, as necessary, will be provided annually.

ATTACHMENT 5

SITEWIDE ANALYTE LIST

The Permittee must monitor for the constituent listed herein in accordance with the latest approved sampling and analysis plan referenced in Condition II.E.28.11. Any changes to this analyte list must be made in accordance with LAC 33:V.321.C.1.b.

Volatiles

1,1,1,2-Tetrachloroethane
1,1,1-Trichloroethane
1,1,2,2-Tetrachloroethane
1,1,2-Trichloroethane
1,1-Dichloroethane
1,1-Dichloroethene
1,2-Dichloroethane
1,2-Dichloroethene (total)
4-Methyl-2-Pentanone (MIBK)
Benzene
Bromomethane
Carbon Tetrachloride
Chlorobenzene
Chloroethane
Chloroform
Chloromethane
Cis-1,2-Dichloroethene
Methylene chloride
Tetrachloroethene
Toluene
Trans-1,2-Dichloroethene
Trichloroethene
Vinyl Chloride

Semivolatiles

1,2,4-Trichlorobenzene
1,2-Dichlorobenzene
1,3-Dichlorobenzene
1,4-Dichlorobenzene
2,4-Dimethylphenol
2-Methylnaphthalene
Carbazole
Hexachlorobenzene
Hexachlorobutadiene
Hexachloroethane
Isophorone
Naphthalene
Pentachloroethane
Phenol

Metals

Antimony
Barium
Vanadium
Lead
Mercury
Thallium

ATTACHMENT 6

Specific HSWA Requirements

1. **Water Well Installation Procedure** - Within one hundred-eighty (180) days of the effective date of this permit, the Permittee shall develop written construction guidelines for construction of wells into the 500 foot and 700 foot aquifer zones within the TI zone. The guidelines shall comply with relevant sections of the *Handbook for Construction of Geotechnical Boreholes and Groundwater Monitoring Systems* and applicable Louisiana Department of Transportation and Development water well regulations. A copy of the final guidelines will be placed in the facility Operating Record. The Permittee shall maintain and revise the guidelines as necessary to promote the effectiveness of the well construction control remedy. The Permittee shall incorporate the guidelines into the facility operational procedures. These guidelines shall be used for all potable water supply wells installed, and plugged and abandoned, in the 500 foot or 700 foot aquifer zones within the TI zone.
2. **Aquifer Use Restriction** - The Permittee shall file a conveyance notice with the local agency regulating land use documenting a restriction on installation of potable water supply wells into the 200 foot aquifer and the 70/80 foot water bearing unit within the TI zone. The Permittee shall provide a certified copy of the notice to the Department within one hundred-eighty (180) days of the effective date of this permit. A copy of the notice shall be maintained in the facility Operating Record.
3. **Enclosed Structure Management** - The Permittee shall maintain the Management Program for Enclosed Structures contained in the 2007 Integrated Final Corrective Measures Study (IFCMS) Report to support the use of occupational standards in risk assessment of potential indoor air risk within the soil and ground water Areas of Interest (AOIs). The Permittee shall implement the plan within the TI zone where Occupational Safety and Health Administration (OSHA) standards have been employed as part of the final remedy selection for the indoor air inhalation pathway in the Corrective Measures Study. A copy of the plan shall be maintained in the facility Operating Record. Annually, the Permittee shall document the results of any assessment of enclosed structures performed in accordance with this management plan as part of PPG Industries' occupational safety and health program.

If excess risk is determined in accordance with the plan, the Permittee shall implement appropriate measures for mitigation of the assessed risk per relevant OSHA requirements. The Permittee shall provide a description of the measures implemented in the annual report.
4. **Site Construction/Excavation Permitting** - The Permittee shall develop a written protocol for on-site management of excavation activities within the areas of the site which have direct contact risk management controls in place (AOIs 3,

4, 8, 14). The protocol shall describe controls which will be used to mitigate direct contact risk to workers in the indicated areas and work methods which will be used to minimize disturbance of the areas. The protocol may be implemented as part of the overall facility work permit programs. A copy of the protocol shall be included in the facility Operating Record within one hundred-eighty (180) days of the effective date of this permit. The Permittee shall implement the procedures as part of facility standard work practice. The protocol will be maintained and revised as necessary as part of the facility operational procedures.

If additional assessment indicates that additional areas warrant such controls for worker protection, the Permittee may designate additional areas of the site for direct contact risk management controls. Documentation of the change shall be included in the Annual Report and the change shall be incorporated into the facility operational procedures.

5. **Recovery Well Evaluation** – Annually, the Permittee shall assess the effectiveness of the horizontal well systems, product recovery systems and associated ground water monitor wells operated in accordance with this permit. The results of the assessment and any recommendations resulting from it are to be documented in the facility Annual Report. Based upon the assessment, the Permittee may modify recovery system operation, request abandonment of wells in writing to the Department, or re-task wells to other use. Notice of changes in system operation or well re-tasking shall be documented in the Annual Report. Upon Department approval of an abandonment request, the Permittee shall abandon the well in accordance with procedures contained in the *Handbook for Construction of Geotechnical Boreholes and Groundwater Monitoring Systems*, and applicable Louisiana Department of Transportation and Development water well regulations.
6. **Groundwater Monitoring Program Evaluation** – Annually, the Permittee shall provide an assessment of the effectiveness of the well systems used for monitoring remediation and for demonstration of compliance. This assessment shall be documented in the facility Annual Report. The assessment shall include a determination if the number of wells used and the usage of the wells demonstrates the effectiveness of the corrective action program. Based upon the assessment, the Permittee may re-task wells to provide for a more effective monitoring program. Notice of the well re-tasking shall be documented in the Annual Report.

Annually, the Permittee shall evaluate the listing of ground water monitoring chemical parameters used at each monitoring point. If the evaluation of the parameters indicates that additional analysis would likely enhance the demonstration of the effectiveness of the corrective action program, the Permittee may add to the list of chemical parameters. Documentation of the change in analysis shall be included in the Annual Report and any additional data gathered by that analysis shall be reported to the Department. Should the evaluation indicate that use of fewer parameters would be equally effective in demonstration

of the effectiveness of the corrective action program, the Permittee may reduce the number of parameters monitored unless the parameter is a constituent specified in Attachment 5 of this permit. To remove Attachment 5 parameters, the Permittee shall request approval in writing to the Department in accordance with the procedures of LAC 33:V.321.C.1.b. Upon Department approval of the request, the Permittee may implement the change and document reduction of parameters used for monitoring in the Annual Report.

When changes to the monitored wells or parameters are made, the Permittee shall review and modify the current ground water monitoring plan as necessary. A copy of the current plan shall be maintained in the facility Operation Record. The plan shall be available for review by the Department on request.

7. **Aquifer Control Program Evaluation** - Annually, the Permittee shall assess the effectiveness of the aquifer control programs and associated ground water pumping and monitor wells operated in accordance with this permit. The results of the assessment and any recommendations resulting from it are to be documented in the facility Annual Report. Based upon the evaluation, the Permittee shall modify pumping of the aquifer as necessary to maintain capture and control of the ground water flow regimes. Following completion of the program modification, the Permittee shall re-assess the effectiveness of the modification. If the modification review indicates further changes are needed to the program, the Permittee shall modify the system as needed and re-assess again as described above.
8. **Maintenance** - The Permittee shall provide for maintenance of facilities, equipment, and infrastructure associated with the selected remedies implemented through this permit. When assessment or inspection indicates maintenance is required, the Permittee shall correct the deviation. Deviations which are identified by the Permittee and corrected within a reasonable timeframe are not subject to enforcement action by the Department. Maintenance which restores the remedy to a condition equivalent to that originally approved through this permit or incorporated implementation reporting may be done by the Permittee without prior Department approval.

This maintenance activity may include replacement of existing facilities or equipment with new equivalents in lieu of exact replacement if such substitution does not decrease the effectiveness of the remedy. Such changes may include updated equipment and controls, modification of caps to minimize maintenance, and similar activities. Where equivalent substitutions or modifications to the existing remedy are made, the Permittee shall document the substitution or modification in the Annual Report. Such substitutions will be incorporated into the permitted remedy when implemented and will be maintained by the Permittee in lieu of the replaced facility or equipment.

9. **Equivalent Measures to Implement Remedies** – During design or implementation of the selected remedies identified in this permit, the Permittee shall review the effectiveness of the selected implementation. If the Permittee's review indicates that alteration of the selected remedy to utilize an equivalent remedial measure would be beneficial and still meet the selected corrective action objective, the Permittee may propose such changes to the implementation as necessary to the Department as a permit modification request in accordance with LAC 33:V.321.C.4. Upon receipt of Department approval, the Permittee may alter the implementation of the remedy as proposed. The altered remedy will become the remedy authorized under this permit.
10. **Reporting Requirements** - The Permittee may prepare a consolidated Annual Report to facilitate documentation of facility activities to the Department. Unless otherwise specified by applicable regulation, the Permittee may fulfill all reporting required by this permit by submission of the required information as a component of the Annual Report. Annual reporting information requirements which have been met by separate reporting are also not required to be repeated in the Annual Report submittal.
11. **Force Majeure** - If and to the extent that the Permittee is prevented or delayed from performing any of its obligations under this Permit by force majeure it shall promptly notify the Department, specifying the matters constituting force majeure together with such evidence in verification thereof as it can reasonably give and specifying the period for which it is estimated that the non-compliance may continue. Force majeure is defined as conditions beyond the control of the Permittee including, but not limited to Acts of God, adverse weather, flooding, Government restrictions, wars, insurrections, labor supply restriction, and/or any other cause beyond the reasonable control of the Permittee. Following notification, the Permittee shall then be relieved of liability for failure to perform or for delay in performing (as the case may be) its obligations under this Permit. The Permittee shall nevertheless use its best endeavors to resume full performance of its obligations under this Permit and to minimize to the extent practical detrimental effects of the non-compliance. When force majeure conditions are abated, the Permittee shall promptly begin full performance of its permit obligations and notify the Department.
12. **Document Modification and Availability** – Unless otherwise specified in this Permit, documents and plans referenced within the permit are not incorporated as permit components which are subject to permit modification criteria specified in LAC 33:V.Chapter 3. The Permittee shall maintain the most current plan or document in the facility Operating Record and shall comply with that document in execution of the requirements of this Permit. The current document shall be made available to the Department for review upon request.

Annually, the Permittee shall review the referenced plans and documents to determine if modification is necessary. If the review indicates that updates to the

documents are necessary, the Permittee shall modify the documents and retain the updated document in the facility record. The modified documents will replace the referenced document for the purposes of compliance with this Permit. If modifications are made, the Permittee shall provide notice of the modification to the Department in the Annual Report. The modification notice shall also include a brief summary of the changes made. If the Administrative Authority determines that the documents no longer meet the requirements of the corrective action objectives in Attachment 2, then the Permittee shall submit a permit modification to update the document.